

TSD File Inventory Index

Date: June 17, 2009

Initial: CMH/aw

Rhodia Inc. (Blue Island)

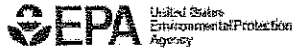
Facility Name: <u>Waters Corporation (Blue Island Facility - the Feller Site)</u>	
Facility Identification Number: <u>LD 085 343 887</u>	
A.1 General Correspondence	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	.1 Correspondence
.1 Correspondence	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	.2 Import/Export Notifications
.6 Annual and Biennial Reports	C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring	D.1 Corrective Action/Facility Assessment
.1 Correspondence	.1 RFA Correspondence
.2 Reports	.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	.3 State Prelim. Investigation Memos
.1 Correspondence	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring	.1 RFI Correspondence
.1 Correspondence	.2 RFI Workplan
.2 Reports	.3 RFI Program Reports and Oversight
B.1 Administrative Record	.4 RFI Draft /Final Report
	5. RFI QA/P

Page 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1			

Note: Transmittal Letter to Be Included with Reports.

Comments: See field data site



Advanced Searches



Select the options with which to search:

All searches are based on an **and** condition. [Hint](#)

Basic	Wildcard	Owner / Operator
Handler ID: <input type="text" value="ILD085343887"/>	Handler Name: <input type="text"/>	
Location Street Number: <input type="text"/>	Location Street Name: <input type="text"/>	
Location City: <input type="text"/>	Location State: <input type="text" value="Select"/>	Location Zip: <input type="text"/>
Location County: <input type="text" value="No Counties to Select"/>	State District: <input type="text"/>	
<input type="checkbox"/> Check this box to search on active sites only.	<input type="checkbox"/> Click this box to also Search Other IDs.	<input type="checkbox"/> Click this box to do a historical name search.

[Search](#) [Reset Form](#) [Back to Main Menu](#)

Page: 1

There are 1 records, displaying 1 - 1. Select the handler to process.

	Act Loc	▲ Handler ID ▼	▲ Handler Name ▼	▲ Address ▼	▲ City ▼	▲ State ▼	▲ County ▼	Active Status	In a Universe	Controls in Place
1	IL	ILD085343887	RHODIA INC	14000 S SEELEY AVE	BLUE ISLAND	IL	COOK	H—	Y	N

Page: 1

URL: /rcrainfo/searches/search.jsp

APPENDIX A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RECORD CENTER

JUN 28 1996

REPLY TO THE ATTENTION OF:

May 10, 1996

WITCO
ATTN: LADELLA WHITAKER
14000 S SEELEY AVE
BLUE ISLAND, IL 60406

RE: US EPA ID Number ILD 085 343 887
Location: 14000 S SEELEY AVE
BLUE ISLAND, IL 60406

In response to your correspondence of 04/01/96, the following
information has been updated:

Contact Person Changed to: MARK LANE

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File



Printed on Recycled Paper



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

attn: La Della Whitaker
Witco Corp
14000 S. Seeley Ave
Blue Island IL 60406

4-10-90

RE: EPA ID #: ILD085343887

In response to your request of 2/90 the following information
has been updated:

- 1) installation name and ownership - Witco Corp
- 2) installation contact - La Della Whitaker safety supv (708) 371-2000
- 3) installation listed as a small quantity generator
- 4) waste codes per your notification

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File

B96

CHANGE OF OWNER/OPERATOR

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

F Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Please refer to Section V, Line-by-Line instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

FEB 17 1998

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☒ A. Initial Notification

☐ B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

ILD085343887

II. Name of Installation (Include company and specific site name)

ALBRIGHT & WILSON

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

14000 SOUTH SEELEY AVENUE

Street (Continued)

City or Town

BLUE ISLAND

State

IL

Zip Code

60406-

County Code

031

County Name

COOK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

WHITAKER

(First)

LADELLA

Job Title

ENVIRONMENTAL

Phone Number (Area Code and Number)

708-371-2000

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

☒

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

ALBRIGHT & WILSON, AMERICAS INC

Street, P.O. Box, or Route Number

4851 LAKE BROOK DRIVE

City or Town

GLEN ALLEN

State

VA

Zip Code

23060-

Phone Number (Area Code and Number)

708-371-2000

B. Land Type

M

C. Owner Type

M

D. Change of Owner Indicator

Yes

No

(Date Changed)

Month

Day

Year

RECEIVED
APR 20 1998

RECEIVED

JAN 29 1998

RCRISENTRY MAR 16 1998

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☒ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Deferral
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
- ☐ a. Utility Boiler
- ☐ b. Industrial Boiler
- ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
- ☐ a. Transporter
- ☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Process
- ☐ b. Re-refine

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒
2. Corrosive (D002) ☐
3. Reactive (D003) ☐
4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

L. Whitaker

Name and Official Title (Type or print)

LADELLA WHITAKER
ENVIRONMENTAL SERVICES SUPERVISOR

Date Signed

1/5/98

XI. Comments

THE FACILITY MANUFACTURES SOAPS AND DETERGENTS FOR THE
PERSONAL CARE MARKET.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



United States Environmental Protection Agency
Washington, DC 20460

3929

Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

Comments

[illegible]

Date Received
(yr. mo. day)

RECEIVED
FEB 15 1990

W I T C O C O R P O R A T I O N

Street or P.O. Box

[illegible]

State

ZIP Code

[illegible]

Street or Route Number

[illegible]

State

ZIP Code

C														I L	60	40	
S	B	L	U	E		I	S	L	A	N	D						

Phone Number (area code and number)

[illegible]

B. Type of Ownership (enter code)

[illegible]

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

☐ C. Industrial Furnace☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) _____

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ILD085343887

		ID — F		Official Use Only	
C					T/A C
W					1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Ladella Whitaker</i>	Name and Official Title (type or print) LADILLA WHITAKER SAFETY SLPV	Date Signed 2/12/90
--------------------------------------	---	------------------------



INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

COMMENTS

1. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

CITY OR TOWN

III. LOCATION OF INSTALLATION

CITY OR TOWN

IV. INSTALLATION CONTACT

V. OWNERSHIP

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VII. MODE OF TRANSPORTATION (transporters only – enter “X” in the appropriate box(es))

VIII. FIRST OR SUBSEQUENT NOTIFICATION

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

~~ATF-181980~~

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

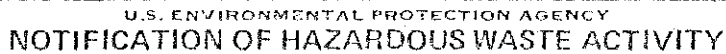
- ☒ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☒ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) JAMES MARTIN OPERATIONS MANAGER	DATE SIGNED Aug 13, 1980
---	---	-----------------------------

25
200
5000



PLEASE PLACE LABEL IN THIS SPACE

III LOCATION OF INSTALLATION

COMMENTS

DATE RECEIVED
(yr., mo., & day)

EPA Form 8700-12 (E-80)

EPA Form 8700-12 (6-80) REVERSE

FORM 1		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">5</td> <td style="width:10%;">F</td> <td style="width:10%;">I</td> <td style="width:10%;">L</td> <td style="width:10%;">D</td> <td style="width:10%;">0</td> <td style="width:10%;">8</td> <td style="width:10%;">5</td> <td style="width:10%;">3</td> <td style="width:10%;">4</td> <td style="width:10%;">3</td> <td style="width:10%;">8</td> <td style="width:10%;">8</td> <td style="width:10%;">7</td> <td style="width:10%;">D</td> </tr> </table>	5	F	I	L	D	0	8	5	3	4	3	8	8	7	D
5	F	I	L	D	0	8	5	3	4	3	8	8	7	D				
LABEL ITEMS		GENERAL INSTRUCTIONS																
I. EPA I.D. NUMBER II. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION	<div style="border: 1px solid black; padding: 20px; min-height: 150px;"> PLEASE PLACE LABEL IN THIS SPACE </div>		<p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>															

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	ONYX CHEMICAL CO.
---	------	-------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title) 2 MARTIN, JAMES OPERATIONS MGR.	B. PHONE (area code & no.) 3 1 2 3 7 1 2 0 0 0
--	--

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX 3 1 4 0 0 0 SOUTH SEELEY AVENUE	B. CITY OR TOWN 4 BLUE ISLAND
C. STATE IL	D. ZIP CODE 6 0 4 0 6

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5 14000 SOUTH SEELEY AVENUE	B. COUNTY NAME CO O K
C. CITY OR TOWN 6 BLUE ISLAND	D. STATE IL
E. ZIP CODE 6 0 4 0 6	F. COUNTY CODE (if known)

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	2	8	C	7	2	8
15	16	17	18	15	16	17	18
(specify) SOAPS AND OTHER DETERGENTS				(specify) CLEANING SOAP, DETERGENTS AND PREPARATION			
C. THIRD				D. FOURTH			
C	7			C	7		
15	16	17	18	15	16	17	18
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME				B. Is the name listed in Item VIII-A also the owner?			
C	8	0	N	C	H	E	M
15	16	17	18	15	16	17	18
YX C H E M I C A L C O				<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 66			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)				D. PHONE (area code & no.)			
F = FEDERAL S = STATE P = PRIVATE				M = PUBLIC (other than federal or state) O = OTHER (specify)			
P				3 1 2 37 1 20 0 0 15 16 17 18 19 20 21 22			
E. STREET OR P.O. BOX							
1 4 000 SOUTH SEELEY AVENUE							
F. CITY OR TOWN				G. STATE		H. ZIP CODE	
C	B	B	L	C	I	L	6
15	16	17	18	15	16	17	18
BLUE ISLAND				6 0 40 6		IX. INDIAN LAND Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
C	9	N		C	9	P	
15	16	17	18	15	16	17	18
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
C	9	U		C	9		
15	16	17	18	15	16	17	18
				78 2 28 9			
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
C	9	R		C	9		
15	16	17	18	15	16	17	18
				(specify) EPA - D.L.P.C. STATE OF ILLINOIS			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of chemical ingredients used in formulation of dishwash detergents, shampoo concentrates, hand cleaners and disinfectants.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert J. Milano, Chairman	Robert J. Milano	11/9/02

COMMENTS FOR OFFICIAL USE ONLY

C	
15	16

FORM 3 RCRA			U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)		I. EPA I.D. NUMBER																																																																																			
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II. FIRST OR REVISED APPLICATION																																																																																								
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.																																																																																								
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<div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) 71</div><div><input type="checkbox"/> 2. NEW FACILITY (Complete item below.) 71</div></div>																																																																																								
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III. PROCESSES - CODES AND DESIGN CAPACITIES																																																																																								
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B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.																																																																																								
<div style="display: flex; justify-content: space-between;"><div><p>1. AMOUNT - Enter the amount.</p><p>2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.</p></div><div><table border="1" style="width: 100%;"><thead><tr><th>PROCESS</th><th>PROCESS CODE</th><th>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</th></tr></thead><tbody><tr><td>Storage:</td><td></td><td></td></tr><tr><td>CONTAINER (barrel, drum, etc.)</td><td>S01</td><td>GALLONS OR LITERS</td></tr><tr><td>TANK</td><td>S02</td><td>GALLONS OR LITERS</td></tr><tr><td>WASTE PILE</td><td>S03</td><td>CUBIC YARDS OR CUBIC METERS</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>S04</td><td>GALLONS OR LITERS</td></tr><tr><td>Disposal:</td><td></td><td></td></tr><tr><td>INJECTION WELL</td><td>D79</td><td>GALLONS OR LITERS</td></tr><tr><td>LANDFILL</td><td>D80</td><td>ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER</td></tr><tr><td>LAND APPLICATION</td><td>D81</td><td>ACRES OR HECTARES</td></tr><tr><td>OCEAN DISPOSAL</td><td>D82</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>D83</td><td>GALLONS OR LITERS</td></tr></tbody></table></div><div><table border="1" style="width: 100%;"><thead><tr><th>PROCESS</th><th>PROCESS CODE</th><th>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</th></tr></thead><tbody><tr><td>Treatment:</td><td></td><td></td></tr><tr><td>TANK</td><td>T01</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>T02</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>INCINERATOR</td><td>T03</td><td>TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR</td></tr><tr><td>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)</td><td>T04</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr></tbody></table></div></div>															PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	Storage:			CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	S02	GALLONS OR LITERS	WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	Disposal:			INJECTION WELL	D79	GALLONS OR LITERS	LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	LAND APPLICATION	D81	ACRES OR HECTARES	OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY	SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	Treatment:			TANK	T01	GALLONS PER DAY OR LITERS PER DAY	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY																				
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EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																																								
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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS..... P
TONS..... T

METRIC UNIT OF MEASURE CODE
KILOGRAMS..... K
METRIC TONS..... M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	8	5	3	4	3	8	8	7	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

R.J.M. CHEMICALS, INC.

212-687-2757

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

99 PARK AVENUE

NEW YORK

N.Y.

10016

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Robert J. Milano

B. SIGNATURE

Robert J. Milano

C. DATE SIGNED

11/9/82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

J. P. Biesiadecki

B. SIGNATURE

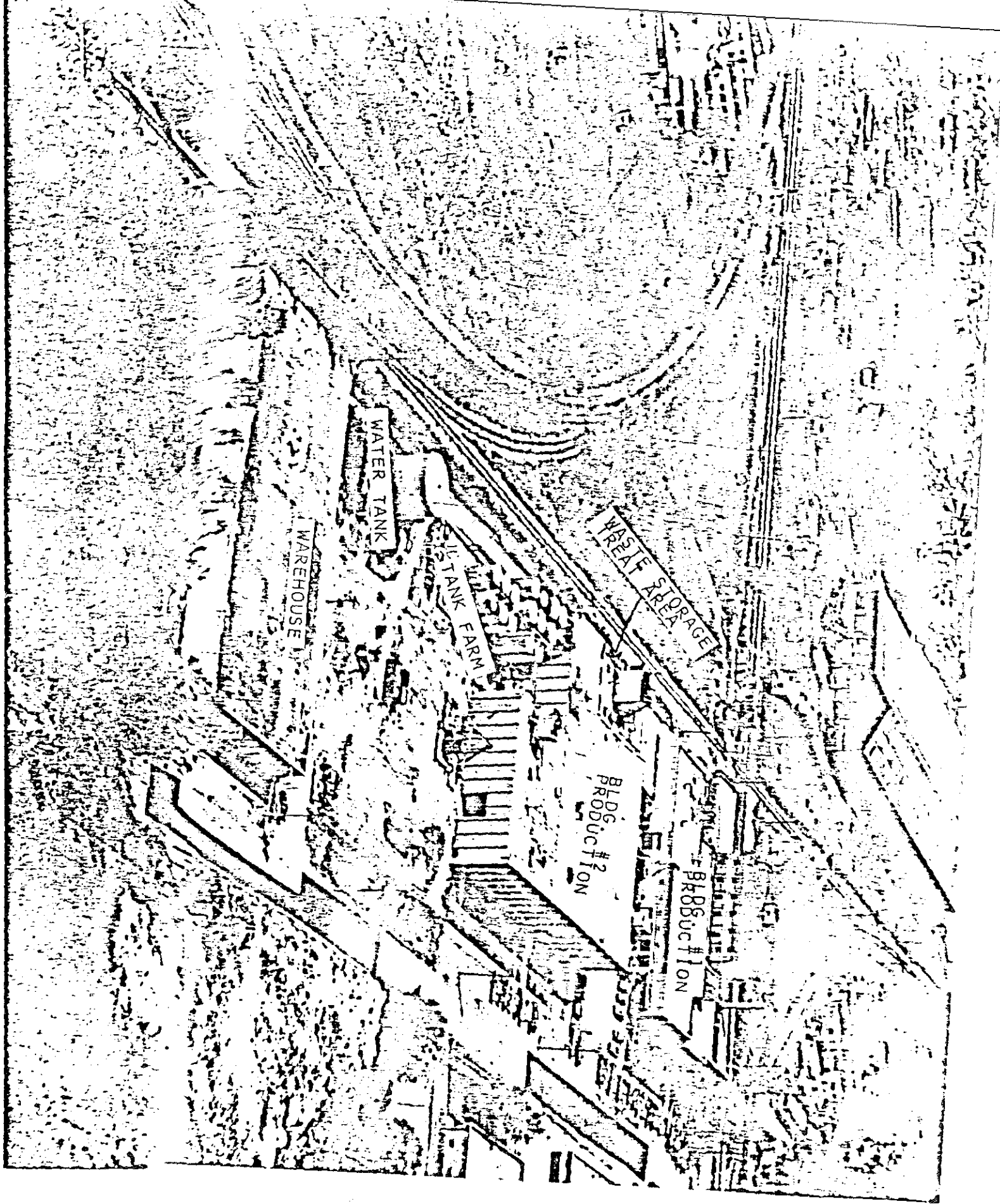
J. P. Biesiadecki

C. DATE SIGNED

11/2/82

V. FACILITY DRAWING (see page 4)

See Attached Exhibit A



WATER TANK

WAREHOUSE

MILK TANK FARM

WASTE STORAGE

BLDG
Production #2

BLDG
Production #1

THE ORIGINAL OF THIS LETTER WAS FILED
IN REGION II IN NEW YORK.



millmaster onyx group

RECEIVED

NOV 9 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

99 PARK AVENUE
NEW YORK, N. Y. 10016
212/687-2757
CABLE MILLOX

November 1, 1982

Regional Administrator
U.S. Environmental Protection Agency
Region I
John F. Kennedy Building
Boston, Massachusetts 02203

Regional Administrator
U.S. Environmental Protection Agency
Region III
6th & Walnut Streets
Philadelphia, Pennsylvania 19106

Regional Administrator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Regional Administrator
U.S. Environmental Protection Agency
Region IX
215 Freemont Street
San Francisco, California 94105

Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007

Regional Administrator
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Regional Administrator
U.S. Environmental Protection Agency
Region VI
First International Building
1201 Elm Street
Dallas, Texas 75270

Department of Natural Resources
Environmental Protection Division
Land Protection Branch
270 Washington Street, S.W.
Atlanta, Georgia 30334

Re: Notification of Change in Ownership of Interim Status Facilities

Dear Regional Administrators:

Kewanee Industries, Inc. ("Kewanee"), a wholly-owned subsidiary of Gulf Oil Corporation ("Gulf") has signed a contract with RJM Chemicals, Inc. for the sale of certain assets including the 13 RCRA hazardous waste management facilities listed below. It is anticipated that closing for this sale will occur on December 1, 1982. It is Kewanee's understanding that RJM Chemicals, Inc. will request that interim status for these 13 RCRA facilities be transferred to it pursuant to 40 C.F.R. Section 122.23(c)(4).

If closing occurs on December 1 as expected, RJM Chemicals will not have sufficient time to submit a revised RCRA Part A application 90 days prior to such closing. Therefore, it is requested that EPA waive the 90 day requirement of 40 C.F.R. Section 122.23(c)(4).

kewanee INDUSTRIES, INC.

RECEIVED
11/10/82

U.S. Environmental Protection Agency
November 1, 1982
Page 2

On July 1, 1982, Gulf, pursuant to 40 C.F.R. Part 265, Subpart H, forwarded to each EPA Region identified herein certain financial assurance documents for closure and post-closure care. Those financial documents contained a corporate guarantee issued by Gulf for the benefit of the Kewanee RCRA facilities identified below. Gulf hereby notifies EPA that it is cancelling this guarantee as of the closing of the sale; or if Gulf cannot lawfully cancel this guarantee as of closing, as soon thereafter as is legally permissible. It is Gulf's understanding that RJM Chemicals will provide an alternative means of satisfying the financial assurance requirements for closure and post-closure care.

Kewanee also requests that upon closing, EPA modify all other documents, records, and information in its files to reflect this change in ownership.

Kewanee's RCRA facilities which are subject to this sale include the following:

Region 1

Mantrose Haeuser Company
Kewanee Industries, Inc.
P. O. Box 149
Robert St. and Olive
Attleboro, MA 02703

EPA # MAD000189167

Region 11

Copygraphics Company
Kewanee Industries, Inc.
134 Clinton Road
Fairfield, NJ 07006

EPA # NJD094970878

Lyndal Chemicals
Kewanee Industries, Inc.
624 Schuyler Avenue
Lyndhurst, NJ 07071

EPA # NJD0003144682

Colonial Printing Ink Company
Kewanee Industries, Inc.
180 East Union Avenue
East Rutherford, NJ 07073

EPA # NJD095171930

U.S. Printing Ink Company
Kewanee Industries, Inc.
343 Murray Hill Parkway
East Rutherford, NJ 07073

EPA # NJD095171948

Onyx Chemical Company
Kewanee Industries, Inc.
190 Warren Street
Jersey City, NJ 07302

EPA # NJD000314674

REGION III

U.S. Printing Inks
Kewanee Industries, Inc.
7942 Angus Court
Springfield, VA 22153

EPA # VAD038792966

REGION IV

Lyndal Chemicals
Kewanee Industries, Inc.
1000 Coronet Drive
P. O. Box 1740
Dalton, GA 30720

EPA # GA0000142893

U.S. Printing Inks
Kewanee Industries, Inc.
5220 Shawland Road
Jacksonville, FL

EPA # FLD095564316

Colonial Printing Ink Company
Kewanee Industries, Inc.
470 Great Southwest Parkway
Atlanta, GA 30336

EPA # GAD094066859

*Non Regulated
4/7/83 PA withdrawn*

REGION V

Onyx Chemical Company
Kewanee Industries, Inc.
P. O. Box 114
4001 Seeley Avenue
Blue Island, IL 60406

Colonial Printing Ink Company
Kewanee Industries, Inc.
22 Plaza Drive
Westmont, IL 60559

EPA # ILD085343887 ✓

EPA # ILD000665448 ✓

G, TSD, PA

G, TSD, PA

U.S. Printing Inks
Kewanee Industries, Inc.
600 Redna Terrace
Cincinnati, OH 45215

EPA # OHD990800930

G, TSD, PA

REGION VI

U.S. Printing Inks
Kewanee Industries, Inc.
Corporate Drive
Dallas, TX 75228

EPA # TXD000729111

REGION IX

U.S. Printing Inks
Kewanee Industries, Inc.
14465 Griffith Street
San Leandro, CA 94577

Colonial Printing Ink Company
Kewanee Industries, Inc.
13930 Borate Street
Santa Fe Springs, CA 90670

EPA # CAD000646364

EPA # CAD096418314

U.S. Printing Inks
Kewanee Industries, Inc.
13710 Borate Street
Santa Fe Springs, CA 90670

EPA # CAD083822346

Very truly yours,

For KEWANEE INDUSTRIES, INC.

For GULF OIL CORPORATION

cc: The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Hazardous Waste
1 Winter Street
Boston, Massachusetts 02108

Commonwealth of Virginia
State Board of Health
906 Madison Building
109 Governor Street
Richmond, Virginia 23219

New Jersey State Department of Environmental Protection
Solid Waste Administration
P. O. Box 1390
Trenton, New Jersey 08625

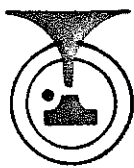
Ohio Environmental Protection Agency
Office of Land Pollution Control
P. O. Box 1049
Columbus, Ohio 43216

State of Florida
Department of Environmental Regulation
Solid Waste Management Program
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Illinois Environmental Protection Agency
Division of Land/Noise Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

California Department of Health Services
Hazardous Waste Management Section
714 P Street
Sacramento, California 95814

Texas Department of Water Resources
Solid Waste Section
P.O. Box 13087
Capitol Station
Austin, Texas 78711



millmaster onyx group

99 PARK AVENUE
NEW YORK, N. Y. 10016
212/687-2757
CABLE MILLOX

November 1, 1982

Mr. Robert J. Milano
860 United Nations Plaza
New York, New York 10017

Re: Hazardous Waste Management Facilities
to be Conveyed to RJM Chemicals, Inc.

Dear Mr. Milano:

Pursuant to 40 C.F.R. Section 265.12(b) you are hereby notified that included in the sale of the Millmaster Onyx Division assets are the 13 RCRA hazardous waste management facilities listed below. These facilities are subject to the requirements of 40 C.F.R. Parts 122 and 265 except in those states where EPA has delegated the RCRA authorization for these parts to such states. In the states where EPA has delegated the RCRA authority for Parts 122 and 265, similar state requirements will exist which will govern the operations of these hazardous waste management facilities.

The Millmaster Onyx Division RCRA hazardous waste management facilities include the following:

Mantrose Haeuser Company
Kewanee Industries, Inc.
P. O. Box 149
Robert St. and Olive
Attleboro, MA 02703

Mr. Robert J. Milano
November 1, 1982
Page 2

Lyndal Chemicals
Kewanee Industries, Inc.
624 Schuyler Avenue
Lyndhurst, NJ 07071

EPA # NJD000314682

Colonial Printing Ink Company
Kewanee Industries, Inc.
180 East Union Avenue
East Rutherford, NJ 07073

EPA # NJD095171930

U.S. Printing Ink Company
Kewanee Industries, Inc.
343 Murray Hill Parkway
East Rutherford, NJ 07073

EPA # NJD095171948

Onyx Chemical Company
Kewanee Industries, Inc.
190 Warren Street
Jersey City, NJ 07302

EPA # NJD000314674

U.S. Printing Inks
Kewanee Industries, Inc.
7942 Angus Court
Springfield, VA 22153

EPA # VAD038792966

U.S. Printing Inks
Kewanee Industries, Inc.
5220 Shawland Road
Jacksonville, FL

EPA # FLD095564316

Mr. Robert J. Milano
November 1, 1982
Page 3

Colonial Printing Ink Company
Kewanee Industries, Inc.
13930 Borate Street
Santa Fe Springs, CA 90670

EPA # CADO96418314

Colonial Printing Ink Company
Kewanee Industries, Inc.
470 Great Southwest Parkway
Atlanta, GA 30336

EPA # GADO94066859

Colonial Printing Ink Company
Kewanee Industries, Inc.
22 Plaza Drive
Westmont, IL 60559

EPA # ILD000665448

Copygraphics Company
Kewanee Industries, Inc.
134 Clinton Road
Fairfield, NJ 07006

EPA # NJD094970878

Lyndal Chemicals
Kewanee Industries, Inc.
1000 Coronet Drive
P. O. Box 1740
Dalton, GA 30720

EPA # GA0000142893

Mr. Robert J. Milano
November 1, 1982
Page 4

Onyx Chemical Company
Kewanee Industries, Inc.
P. O. Box 114
4001 Seeley Avenue
Blue Island, IL 60406

EPA # ILD085343887

U.S. Printing Inks
Kewanee Industries, Inc.
600 Redna Terrace
Cincinnati, OH 45215

EPA # OHD990800930

U.S. Printing Inks
Kewanee Industries, Inc.
Corporate Drive
Dallas, TX 75228

EPA # TXD000729111

U.S. Printing Inks
Kewanee Industries, Inc.
14465 Griffith Street
San Leandro, CA 94577

EPA # CAD000646364

U.S. Printing Inks
Kewanee Industries, Inc.
13710 Borate Street
Santa Fe Springs, CA 90670

EPA # CAD083822346

Very truly yours,



for KEWANEE INDUSTRIES, INC.

R.J.M. Chemicals, INC.

99 Park Avenue

New York, N.Y. 10016

December 7, 1982

Regional Administrator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attn: Mr. James Mayka

Re: Letter to USEPA Regional Administrator dated 11-01-82
Change in Ownership - Interim Status Facilities
Kewanee Industries, Inc. to R.J.M. Chemicals, Inc.

Dear Mr. Mayka:

The change in ownership referenced above of RCRA Interim Status Facilities is now scheduled to take place on December 21, 1982.

Enclosed please find revised Part A permit applications on behalf of the following existing Interim Status Facilities:

REGION V

Onyx Chemical Company
Kewanee Industries, Inc. H
P.O. Box 114
4001 Seeley Avenue
Blue Island, IL 60406

EPA #ILD085343887G, TSO, PA



Letter to USEPA Regional Administrator dated 11-01-82
Change in Ownership - Interim Status Facilities
Kewanee Industries, Inc. to R.J.M. Chemicals, Inc.

Page 2

① Documents pertaining to financial requirements are also enclosed. We would appreciate written confirmation that the transfer of Interim Status will take place upon the sale.

Additionally, R.J.M. Chemicals, Inc. will be changing its name to Millmaster Onyx Group, Inc. We expect the name change to be complete on or about January 15, 1983. Please advise what further notification will be required for the name change.

If you have any questions regarding this issue, please contact me at (201) 464-1200. Please address all correspondence in this matter to me at the address below.

Very truly yours,



Robert E. Roller
R.J.M. Chemicals, Inc.
c/o Millmaster Onyx Group
Engineering & Environmental
Affairs Dept.
11 Summit Avenue
Berkeley Heights, N.J. 07922

RER:gm

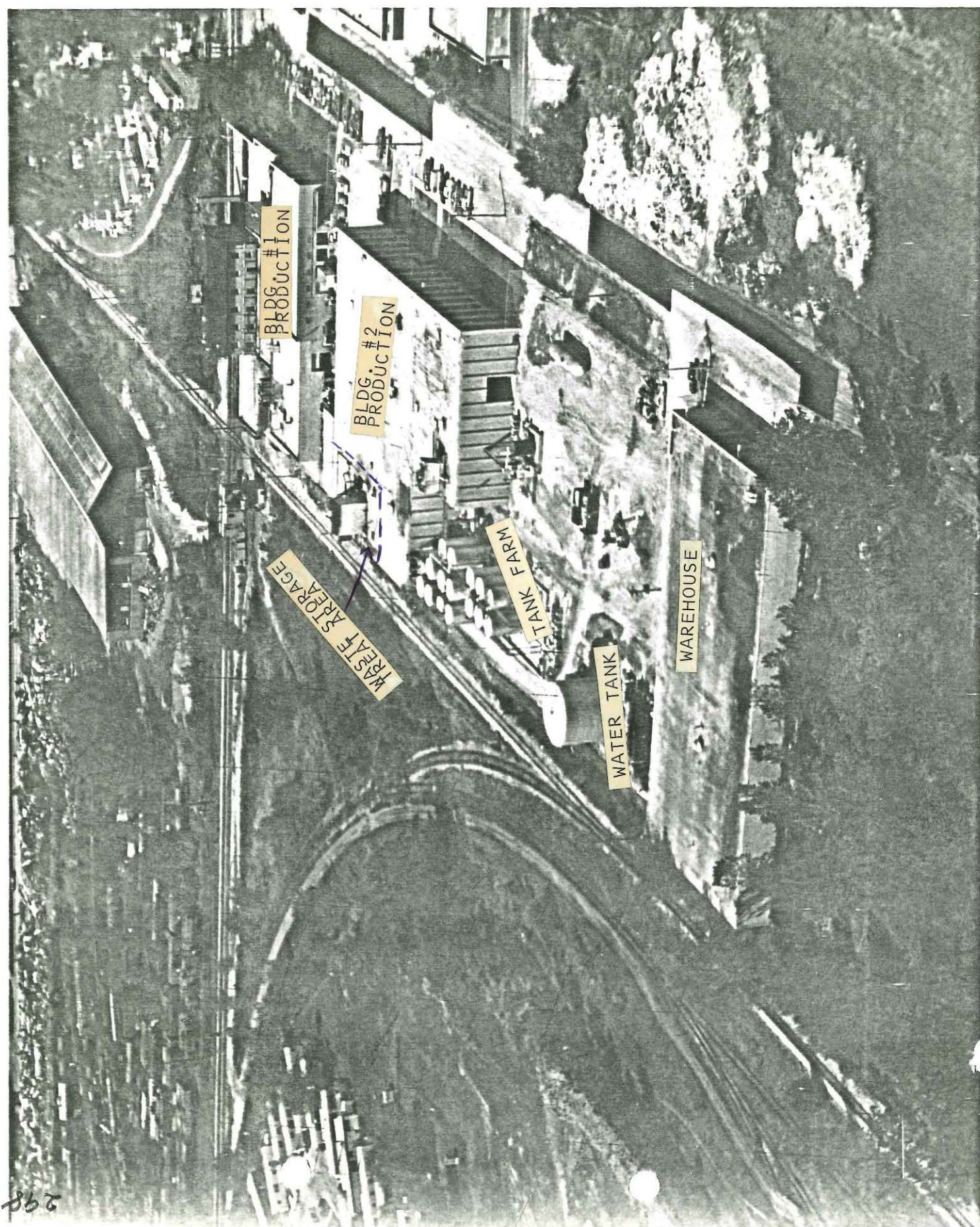
Enclosure: (1) Original to U. S. Environmental Protection Agency
Region V

cc: Illinois Environmental Protection Agency
Division of Land/Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Attn: Mr. Thomas E. Cavanagh Jr.
Manager Permit Section

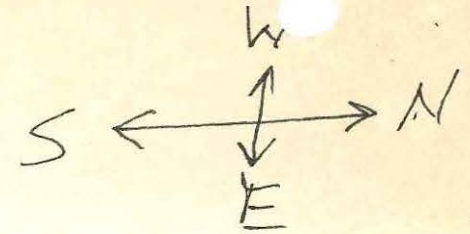
Certified Mail
Return Receipt Requested

① Original of financial requirements
have been sent to IL EPA



Picture taken March, 1979

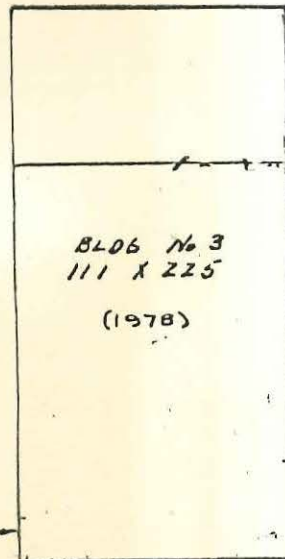
Exhibit A
Re: Part V Facility Drawing



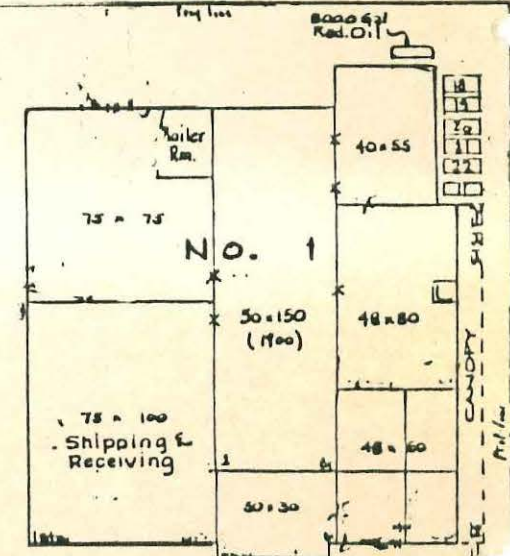
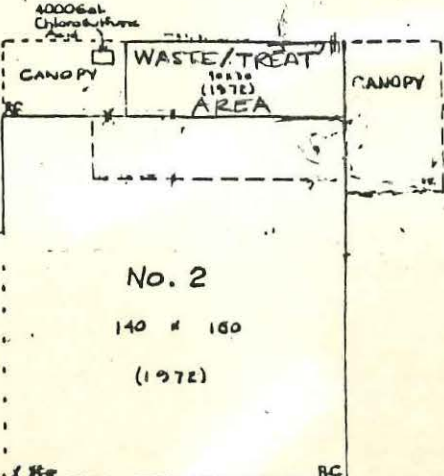
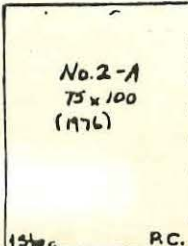
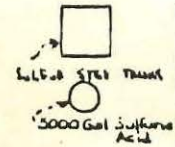
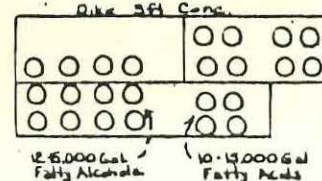
P/L = 1297 ft

VACANT LAND 66' x 100' F

VACANT LAND FOR SEVERAL
HUNDRED FEET



111' x 225'
5' x 10' x 10'



SCALE: 1 INCH = 80 FEET

SEELEY AVE.

INDIANA HARBOR LINE RR

file



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

APR 17 1984

Irving Gaines, President
Millmaster Onyx Group, Incorporated
c/o Onyx Chemical Company
190 Warren Street
Jersey City, New Jersey 07302

RE: Withdrawal of Part A (Protective Filing)
FACILITY NAME: Onyx Chemical Company
U.S. EPA ID NO.: ILD085343887

Dear Mr. Gaines:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of March 15, 1983, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility has not, since November 19, 1980, treated, stored, or disposed of hazardous waste, and this permit application was a protective filing. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your U.S. EPA Identification number, if you notified as a generator or transporter of hazardous waste.

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Protective Filing)," in all correspondence on this matter.

Sincerely yours,

A handwritten signature in cursive script, reading "Karl J. Klepitsch, Jr.".

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: James O. Martin, Operations Manager
Robert E. Roller, Regulatory Affairs Manager
IEPA

Original Notification to Mr. Klepitsch



Onyx Chemical Company

Millmaster Onyx Group, Inc.

filed

14000 South Seeley Avenue
Blue Island, Illinois 60406
Chicago: (312) 239-1300
Blue Island (312) 371-2000

RECEIVED
MAR 18 1983
WASTE MANAGEMENT
BRANCH

March 15, 1983

Chief, Waste Management Branch
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: Request to Withdraw Part A
Hazardous Waste Permit Application

Facility: Onyx Chemical Company
Div. of Millmaster Onyx Group, Inc.
14000 South Seeley Avenue
Blue Island, Illinois 60406

USEPA ID NO.: ILDO85343887 *PA, G, TSD*

Dear Mr. Klepitsch:

We wish to withdraw our Part A Hazardous Waste Permit Application for the above subject location.

During the summer of 1980 "best advice" was to file Part A, form 1 and 3, to obtain Interim Status should the storage of hazardous wastes beyond 90 days become necessary.

This location does not operate hazardous waste treatment or disposal facilities and at no time since November 19, 1980 have hazardous wastes, subject to 40CFR 265, been stored beyond 90 days.

We wish to retain Generator status and our EPA I.D. Number.

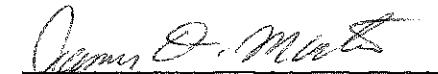
continued.....

RECEIVED
7/21/83


March 15, 1983
Page 2

Should you have any questions concerning this request,
please contact Mr. Marvin Parrott at 312/371-2000.

Sincerely yours,
OPERATOR CERTIFICATION:


James O. Martin
Operations Manager
Onyx Chemical Co.

OWNER CERTIFICATION:


Irving Gaines
President
Millmaster Onyx Group, Inc.
99 Park Avenue
New York, New York 10016

Certified Mail
Return Receipt Requested

cc: Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Attn: Mr. T. E. Cavanagh, Jr.

Robert E. Roller, *Req. Aff. Mgr. - Onyx*
Millmaster Onyx Group, Inc.

11 Summit Ave
Berkley, N.J. 07922

MAILED 10 MAR 21 1983

676 E 10

FEB 1 5 1983

Robert J. Milano, Chairman
R.J.M. Chemicals Incorporated
99 Park Avenue
New York, N.Y. 10016

monney

RE: ILD085343887

Dear Mr. Milano:

This letter is to acknowledge that the United States Environmental Protection Agency (U.S.EPA) has completed its review of your company's revised Part A hazardous waste permit application and your letter of December 7, 1982. The Part A was found to be unacceptable because Items 3 and 4 of Form 3 were not filled out.

Examination of the Notification of Hazardous Waste Activity, which was submitted to this office on August 13, 1980, revealed that this facility was handling commercial chemical product hazardous waste U154 (Methanol) and hazardous wastes which have the following characteristics: ignitability, corrosivity, reactivity, and extraction procedure toxicity. The original Part A, which was submitted on November 19, 1980, listed only corrosive hazardous waste. In addition, the information contained in Form 3, Item 3 was not consistent with that in Item 4. Item 3 indicated that hazardous waste was stored in containers (S01) and treated in tanks (T01), however, Item 4 indicated that hazardous waste D002 (Corrosive) was treated in tanks (T01) and landfilled (D80). D80 was not included in Item 3, nor was S01 included in Item 4.

Subsequently a member of my staff contacted the facility to clarify these items and after being informed that the landfill was not part of the facility, he requested that a corrected Part A be submitted to this office.

While conducting an inspection of this facility on May 19, 1982, a representative of the Illinois Environmental Protection Agency (IEPA) was informed by Marvin Parrott, safety engineer, that the facility handled no hazardous waste. Thereafter, Mr. Parrott wrote a letter to the IEPA which requested that his company's Notification of Hazardous Waste Activity be withdrawn. This request did not contain sufficient information for the U.S. EPA to concur. Consequently letters were sent to Mr. Martin on August 17, 1982, and to Mr. Parrott on August 31, 1982, which requested specific withdrawal information. This office has not yet received a response to those letters.

Prior to processing your change of ownership request, this office must receive both an accurate up-to-date Notification (enclosed) and a complete up-to-date Part A (enclosed).

Please contact Mr. Greg Weber of my staff, at (312) 886-3719, if you have any questions regarding this matter.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: J.O. Martin ONYX Blue Island
Marvin Parrott ONYX Blue Island
Bonnie Elder IEPA Maywood
Tom E. Cavanagh, Jr. IEPA Springfield

bcc: Robert Stone SIO
Part A File

5HW:G.WEBER:ad 2/8/83

INITIALS	DATE	TYPIST	AUTHOR	FEU CHIEF	STU #1 CHIEF	STU #2 CHIEF	TIS CHIEF	WMB CHIEF	AHMD DIRECTOR
		A.P.	CW						
	2/10/83		2/10/83		2/10/83		2/14/83	2/5/83	

Handwritten notes:
- Above TIS CHIEF: *2/11/83*
- Above WMB CHIEF: *2/14/83*
- Above AHMD DIRECTOR: *2/14/83*

REC
R.J.M. Chemicals, INC.
99 Park Avenue
New York, N.Y. 10016

Bob B.

- copy file
- copy Region

December 7, 1982

Regional Administrator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attn: Mr. James Mayka

RECEIVED

DEC 13 1982

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Re: Letter to USEPA Regional Administrator dated 11-01-82
Change in Ownership - Interim Status Facilities
Kewanee Industries, Inc. to R.J.M. Chemicals, Inc.

Dear Mr. Mayka:

The change in ownership referenced above of RCRA Interim Status Facilities is now scheduled to take place on December 21, 1982.

Enclosed please find revised Part A permit applications on behalf of the following existing Interim Status Facilities:

REGION V

+ Onyx Chemical Company
Kewanee Industries, Inc.
P.O. Box 114
4001 Seeley Avenue
Blue Island, IL 60406

EPA #ILD085343887 G, TSD, PA-9

RECEIVED
1/10/84

6-6157
60393

Letter to USEPA Regional Administrator dated 11-01-82
Change in Ownership - Interim Status Facilities
Kewanee Industries, Inc. to R.J.M. Chemicals, Inc.

Page 2

Documents pertaining to financial requirements are also enclosed. We would appreciate written confirmation that the transfer of Interim Status will take place upon the sale.

Additionally, R.J.M. Chemicals, Inc. will be changing its name to Millmaster Onyx Group, Inc. We expect the name change to be complete on or about January 15, 1983. Please advise what further notification will be required for the name change.

If you have any questions regarding this issue, please contact me at (201) 464-1200. Please address all correspondence in this matter to me at the address below.

Very truly yours,

Robert E. Roller
R.J.M. Chemicals, Inc.
c/o Millmaster Onyx Group
Engineering & Environmental
Affairs Dept.
11 Summit Avenue
Berkeley Heights, N.J. 07922

RER:gm

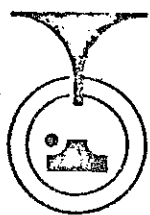
Enclosure: (1) Original to U. S. Environmental Protection Agency
Region V

cc: Illinois Environmental Protection Agency
Division of Land/Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Attn: Mr. Thomas E. Cavanagh Jr.
Manager Permit Section

Certified Mail
Return Receipt Requested

To not file



onyx chemical company

MILLMASTER ONYX GROUP

14000 S. SEELEY AVENUE
BLUE ISLAND, ILLINOIS 60406
312/238-9841
CABLE ONYX

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF

DATE 8/17/82

August 10, 1982

Environmental Protection Agency
1701 South First Street
Maywood, IL 60153

CERTIFIED MAIL

Re: General-Cook County
Blue Island/Onyx Chemical
ILD085343887 *GITSD, TPA*

Gentlemen:

On May 19, 1982, an inspection of our Company was conducted by your Agency. Based upon the information given to your representative, Bonnie Eleder, it was determined by your Agency that Onyx Chemical, Blue Island facility is exempt from Title 35, Subtitle G, of the Illinois Pollution Control Board Rules and Regulations, as amended.

Since our facility is no longer subject to Title 35, Subtitle G regulations, it is requested that Form 8700-12 Notification of Hazardous Activity submitted to your Agency be withdrawn.

If further information is needed to close this matter, contact the writer.

Thank you.

Very truly yours,

ONYX CHEMICAL COMPANY

Marvin L. Parrott
Safety Engineer

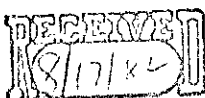
/kaw

cc: Biesiadecki, J.P.
Martin, J.O.
US EPA - Region V

RECEIVED

AUG 12 1982

WASTE MANAGEMENT BRANCH
EPA REGION V



FORM 1		U.S. ENVIRONMENTAL PROTECTION AGENCY		EPA I.D. NUMBER	
GENERAL		GENERAL INFORMATION		F I L D 08 5 34 3 88 7 3 D	
LABEL ITEMS		Consolidated Permits Program (Read the "General Instructions" before starting.)		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER		PLEASE PLACE LABEL IN THIS SPACE		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	ONYX CHEMICAL CO. KEWANEE INDUSTRIES INC.
---	------	---

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2	MARTIN J.O.	312	371	2000

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	14000 SOUTH SEELEY AVENUE			I 1	60406

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	14000 SOUTH SEELEY AVENUE					I 1	60406	031

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7	2841	(specify)							C	7	2843	(specify)						
SOAPS & OTHER DETERGENTS										SOAP, DETERGENTS AND CLEANING PREPARATION									
C. THIRD										D. FOURTH									
C	7		(specify)							C	7		(specify)						

VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?									
C	8	KEWANEE INDUSTRIES INC.													<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 66									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE															C A 212 687 2757 15 16 - 18 19 - 21 22 - 25									

E. STREET OR P.O. BOX																
99 PARK AVE.																
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND		
C	B	NEW YORK								NY		10016		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52		

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	T	I	9	N						C	T	I	9	P					
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	T	I	9	U						C	T	I	9		782289 (specify) EPA - D.L.P.C. State of Illinois				
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	T	I	9	R						C	T	I	9		(specify)				

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of chemical ingredients used in formulation of dishwash detergents, shampoo concentrates, hand cleaners and disinfectants.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
J. O. Martin										<i>J O Martin</i>										11/14/80									

COMMENTS FOR OFFICIAL USE ONLY

C	C													
---	---	--	--	--	--	--	--	--	--	--	--	--	--	--

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

N/A

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																																																														
<table border="1"> <tr> <td>S</td><td>I</td><td>D</td><td>0</td><td>8</td><td>5</td><td>3</td><td>4</td><td>3</td><td>8</td><td>8</td><td>7</td><td>3</td> </tr> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td> </tr> </table>													S	I	D	0	8	5	3	4	3	8	8	7	3	1	2	3	4	5	6	7	8	9	10	11	12	13	<table border="1"> <tr> <td>S</td><td colspan="10">DUP</td><td>T/A/C</td> </tr> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td> </tr> </table>												S	DUP										T/A/C	1	2	3	4	5	6	7	8	9	10	11	12	13
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IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																																																																											
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				<table border="1"> <tr> <th colspan="12">1. PROCESS CODES (enter)</th> <th rowspan="2">2. PROCESS DESCRIPTION (if a code is not entered in D(1))</th> </tr> <tr> <th>27</th><th>28</th><th>29</th><th>27</th><th>28</th><th>29</th><th>27</th><th>28</th><th>29</th><th>27</th><th>28</th><th>29</th> </tr> </table>												1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))	27	28	29	27	28	29	27	28	29	27	28	29																																			
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IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	8	5	3	4	3	8	8	7	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	1	3	8	1	5
65	66	67	68	69	71

LONGITUDE (degrees, minutes, & seconds)

8	7	4	0	1	7
72	74	76	77	79	

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

KEWANEE INDUSTRIES INC.

2. PHONE NO. (area code & no.)

2 12 - 6 87 - 2 75 7

3. STREET OR P.O. BOX

99 PARK AVENUE

4. CITY OR TOWN

NEW YORK

5. ST.

N Y

6. ZIP CODE

1 00 1 6

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Irving Gaines

B. SIGNATURE



C. DATE SIGNED

11/19/80

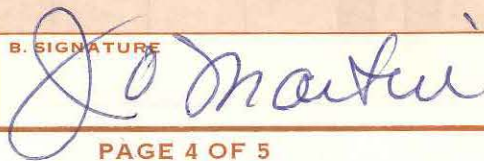
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

J. O. Martin

B. SIGNATURE



C. DATE SIGNED

11/14/80

V. FACILITY DRAWING (see page 4)

See Attached Exhibit A



onyx chemical company
MILLMASTER ONYX GROUP

14000 S. SEELEY AVENUE
BLUE ISLAND, ILLINOIS 60406
312/238-9841
CABLE ONYX

August 10, 1982

Environmental Protection Agency
1701 South First Street
Maywood, IL 60153

CERTIFIED MAIL

Re: General-Cook County
Blue Island/Onyx Chemical
ILD085343887 *G, TSD, TPA*

Gentlemen:

On May 19, 1982, an inspection of our Company was conducted by your Agency. Based upon the information given to your representative, Bonnie Eleder, it was determined by your Agency that Onyx Chemical, Blue Island facility is exempt from Title 35, Subtitle G, of the Illinois Pollution Control Board Rules and Regulations, as amended.

Since our facility is no longer subject to Title 35, Subtitle G regulations, it is requested that Form 8700-12 Notification of Hazardous Activity submitted to your Agency be withdrawn.

If further information is needed to close this matter, contact the writer.

Thank you.

Very truly yours,

ONYX CHEMICAL COMPANY

Marvin L. Parrott
Safety Engineer

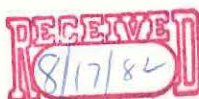
/kaw

cc: Biesiadecki, J.P.
Martin, J.O.
US EPA - Region V

RECEIVED

AUG 12 1982

WASTE MANAGEMENT BRANCH
EPA. REGION V





UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

17 AUG 1982

J. O. Martin
Onyx Chemical Company
Kewanee Industries Incorporated
14000 South Seeley Avenue
Blue Island, Illinois 60406

RE: Request for Information--Hazardous Waste Permit
Review (Elementary Neutralization Unit)
FACILITY: Onyx Chemical Company (Kewanee Industries Incorporated)
NAME: USEPA ID NO.: ILD 085 343 887

Dear Mr. Martin:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to qualify as an elementary neutralization unit as defined in 40 CFR Part 260.10 (enclosed), and is excluded from the permit requirements as outlined in 40 CFR Part 122.21 (d)(2)(enclosed). Please review these requirements to determine if your facility qualifies as an elementary neutralization unit. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265 Subpart G (enclosed).

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Elementary Neutralization Unit," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: Irving Gaines

D. Parker 8/17/82



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

31 AUG 1982

Mr. Marvin L. Parrott, Safety Engineer
Onyx Chemical Company-Kewanee Industries Incorporated
1400 South Seeley Avenue
Blue Island, Illinois 60406

RE: Permit Application Withdrawal Letter
(Insufficient Information)

FACILITY NAME: Onyx Chemical Co.-Kewanee Industries Inc.
USEPA ID NO.: ILD 085 343 887

Dear Mr. Parrott:

This is to acknowledge receipt of your letter of August 10, 1982, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

Please do not hesitate to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter, (Insufficient Information)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: J. O. Martin
Irving Gaines

8/31/82
aw

Witco

0310660002
BOOK- to Ken. Carr

Witco Corporation
Oleo/Surfactants Group
14000 South Seeley Avenue
Blue Island, IL 60406
(708) 371-2000
(708) 597-3016 Fax

April 1, 1996

U.S. EPA
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Attention: Ms. Sharon Kiddon

Dear Ms. Kiddon:

Please note that Carl A. Mason is no longer the contact person for:

U.S. EPA ID Number: ILD 085 343 887

Location: 14000 South Seeley Avenue
Blue Island, Illinois 60406

The new contact person is Richard Lissenden or Mark Lane.

If you have any questions, please call me at

(708) 371-2000.

Respectfully,
WITCO CORPORATION

LaDella Whitaker

LaDella Whitaker
SHEA Coordinator

RECEIVED

APR 25 1996

U. S. EPA, REGION IV
SWB-PMS

RCRIS ENTRY MAY 03 1996



Certificate
QSR-156



A Company Dedicated To Total Quality



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **RECEIVED**

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

WMD RECORD CENTER

JUN 13 1996

REPLY TO THE ATTENTION OF:

March 20, 1996

Witco Inc
Attn: LaDella Whitaker
14000 S Seeley Ave
Blue Island, IL 60406

RE: US EPA ID Number ILD 085 343 887
Location: 14000 S Seeley Ave
Blue Island, IL 60406

In response to your correspondence of 01/22/96, the following
information has been updated:

Contact Person Changed to: Carl A. Mason

If you have any questions, please call me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

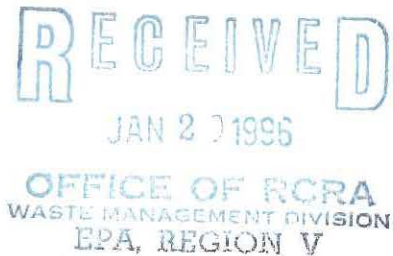
cc: State Agency
File



Witco Corporation
Oleo/Surfactants Group
14000 South Seeley Avenue
Blue Island, IL 60406
(708) 371-2000
(708) 597-3016 Fax

January 22, 1996

United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590



Attn: Sharon Kiddon

This letter is to inform your office that Carl A. Mason is no longer the contact at this facility. The new contact is Richard Lissenden.

US EPA ID Number ILD 085 343 887
Location: 14000 S. Seeley Avenue
Blue Island, IL 60406

If you have any questions, please call me at (708)371-2000.

Respectfully,

WITCO CORPORATION

LaDella Whitaker
SHEA Supervisor

RCRIS ENTRY MAR 04 1996



A Company Dedicated To Total Quality

Witco

ENTE. D MAR 17 1994

Oleochemicals/Surfactants Group

Witco Corporation, 14000 South Seeley Avenue, Blue Island, IL 60406
Telephone 708-371-2000 Fax 708-597-3016

Loc-

ILD 085-343-887

RECEIVED

FEB 16 1994

U. S. EPA, REGION V
SWB - PMS

January 31, 1994

Mr. James Pierce
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

Dear Mr. Pierce:

C
Please update the contact person your agency has listed for Witco Corporation located at 14000 S. Seeley Avenue, Blue Island, IL 60406. The new contact person is **Mr. Carl A. Mason** and the technical contact is Daniel A. Nawrocki. The facility identification number is 031024AAY.

Sincerely,
Witco Corporation

LaDella Whitaker

LaDella Whitaker
Environmental Services Supervisor

RECEIVED

FEB 03 1994

IEPA/DLPC

Handwritten initials



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

May 2, 1994

WITCO
ATTN: LADELLA WHITAKER
14000 S SEELEY AVE
BLUE ISLAND IL 60406

RECEIVED
WMD RECORD CENTER

MAY 03 1994

RE: US EPA ID Number ILD 085 343 887
Location: 14000 S SEELEY AVE
BLUE ISLAND IL 60406

In response to your correspondence of 02-16-94, the following
information has been updated:

CONTACT NAME

CARL A MASON

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File



Printed on Recycled Paper

C.2 Compliance and Enforcement

LAND AND CHEMICALS DIVISION

Type of Document: No Further Action Letter

Name of Document: Rhodia, Inc. NFA letter

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	Dan Chachakis <u>DC</u>	<u>03-21-2013</u>
SECTION APA:	_____	_____
SECTION CHIEF:	Walt Francis <u>WF</u>	<u>3/21/13</u>
BRANCH APA:	Gaye Cuerington <u>GC</u>	<u>3/22/13</u>
BRANCH CHIEF:	Gary Victorine <u>GV</u>	<u>4/2/13</u>
DIVISION APA:	NA	_____
DIVISION DIRECTOR:	NA	_____
OTHERS:	_____	_____
	_____	_____
DRA:	NA	_____
RA:	NA	_____

RETURN TO: Dan Chachakis, LR-8J

PHONE: 6-9871

COMMENTS:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 09 2013

REPLY TO THE ATTENTION OF:
LR-8J

Philip McCray
Plant Manager
Rhodia, Incorporated
Blue Island Plant, Novacare
14000 South Seeley Avenue
Blue Island, Illinois 60406

Re: Rhodia, Incorporated, Blue Island Plant, Novacare
EPA ID No.: ILD085343887

Dear Mr. McCray:

On July 18, 2012, a representative of the U.S. Environmental Protection Agency inspected Rhodia, Incorporated's facility located in Blue Island, Illinois (Rhodia). In response to violations of Resource Conservation and Recovery Act identified during the inspection, we issued a Notice of Violation to you on January 24, 2013. Subsequent to our Notice of Violation, you submitted additional information regarding the identified violations in correspondence dated March 6, 2013.

This letter is to inform you that EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Illinois Environmental Protection Agency will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Daniel Chachakis, of my staff, at (312) 886-9871.

Sincerely,

A handwritten signature in cursive script, reading "Gary J. Victorine", is written over the typed name.

Gary J. Victorine
Chief
RCRA Branch

cc: Todd Marvel, Illinois Environmental Protection Agency; todd.marvel@illinois.gov



March 6, 2013

Via FedEx No. 844342650901

Mr. Daniel Chachakis
U.S. EPA, Region 5
77 West Jackson Boulevard, LR-8J
Chicago, IL 60604

Re: Response to RCRA Compliance Inspection Evaluation
Rhodia Inc.
14000 South Seeley Avenue
Blue Island, IL 60406
EPA ID No. ILD085343887

Dear Mr. Chachakis,

Enclosed is Rhodia's response to U.S. EPA's RCRA Compliance Inspection Evaluation, dated January 24, 2013 and received on January 28, 2013 at Rhodia's Blue Island plant. Thank you again for approving a one-week extension to submit this response to U.S. EPA. The original inspection letter and extension approval is included as Appendix A, and below is a summary of our responses to each of the numbered items noted in the inspection letter.

1. Attached is a copy of manifest 003056706FLE with the handwritten signature of the owner/operator of the designated facility. Please see Appendix B for this documentation.
2. Attached are updated pages of the contingency (emergency response) plan that address the following:
 - a. Actions that facility personnel take in the event of an explosion.
 - b. Home address of emergency coordinator (and alternate).
 - c. List of emergency equipment, including the location and physical description of each item.

Please see Appendix C for this documentation.

3. Attached is the waste management procedure, requiring the ESP waste accumulation drum (and other waste containers) to be closed unless adding or removing waste to/from it. We have included a picture of the Single Point Lesson (SPL) located near the waste accumulation area, which instructs the operator to place a bung in the drum when not in use. Please see Appendix D for this documentation.
4. Attached is the waste management procedure requiring that universal waste be placed in the appropriate containers and that these containers are closed unless adding or removing wastes.



5. Attached is the waste management procedure requiring accumulation start dates to be placed on universal waste containers when accumulation is initiated. We have included an example picture of a closed fluorescent tubes box with a dated label. Please see Appendix D for this documentation that supports Items 4 and 5.

Item of Concern (elemental sulfur observed atop molten sulfur pit)

Rhodia stores molten sulfur in a sulfur pit and combusts this raw material as the first step in its sulfation/sulfonation process. When sulfur is unloaded into the pit, there may be trace amounts of solid, elemental sulfur that remain from the unloading process. Since elemental sulfur is not soluble in water and is virtually non-toxic, there is limited concern in rainwater mixing with the sulfur and compromising the integrity of the sulfur pit cover. Rhodia performs routine housekeeping inspections of all areas of the plant and if solid sulfur material is observed around the pit, this material is collected in pails/drums and disposed of as non-hazardous waste.

Please call me at (708) 382-1841 if you have any questions on the enclosed materials.

Sincerely,

Jeffrey Chou
Regional Environmental Engineer

Enclosure

Appendix A
Compliance Inspection Evaluation Letter and Extension Approval



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 24 2013

RECEIVED

01-23-13

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7679 6156
RETURN RECEIPT REQUESTED

Philip McCray
Plant Manager
Rhodia, Incorporated
Blue Island Plant, Novecare
14000 South Seeley Avenue
Blue Island, Illinois 60406

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No.: ILD085343887

Dear Mr. McCray:

On July 18, 2012, a representative of the U. S. Environmental Protection Agency inspected Rhodia's facility located in Blue Island, Illinois (Rhodia). The purpose of the inspection was to evaluate Rhodia's compliance with regulations related to the generation, treatment, storage and disposal of hazardous waste, universal waste and used oil. We have enclosed a copy of the inspection report for your reference.

Based on information provided by Rhodia's personnel, review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that Rhodia is in violation of the following requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR):

1. A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage or disposal who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility must submit an exception report within 45 days of the date the waste was accepted by the initial transporter.

At the time of the inspection, Rhodia was missing the copy of manifest 003056706FLE from 2009 with the handwritten signature of the owner or operator of the designated facility. Rhodia was unable to provide an exception report for manifest 003056706FLE at the time of the inspection. Please provide a copy of manifest 003056706FLE with the handwritten signature of the owner or operator of the designated facility, or a copy of an exception report.

2. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided that while being accumulated on-site the generator maintains a contingency plan that:

a. Describes the actions facility personnel must take in response to fires, explosions or any planned or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility;

b. Lists the names, addresses and phone numbers of all persons qualified to act as emergency coordinators; and the generator

c. Includes a list of all emergency equipment at the facility, including the location and a physical description of each item on the list, and a brief outline of its capabilities.

See 35 IAC § 722.134(a)(4) referencing 35 IAC § 725.152 [40 CFR §262.34(a)(4) referencing 40 CFR § 265.52]

At the time of the inspection, Rhodia's contingency plan did not describe the actions facility personnel must take in the event of an explosion; the contingency plan did not list the address of the emergency coordinator; and the contingency plan did not include a list of emergency equipment including the location and physical description of each item and a brief outline of its capabilities. Please provide a copy of an updated contingency plan that addresses the above.

3. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided that while being accumulated on-site the generator who accumulates hazardous waste in containers at or near any point of generation must keep the container closed unless adding or removing waste. See 35 IAC § 722.134(c)(1)(A) referencing 35 IAC § 725.273(a) [40 CFR §262.34(c)(1)(i) referencing 40 CFR § 265.173(a)].

At the time of the inspection, Rhodia had a container at or near the point of generation in Building 2 that was not closed, and there was no operator present adding or removing waste. Please provide a management or engineering change that causes the container to be closed unless adding or removing waste. Please provide a picture of the container.

4. A small quantity handler of universal waste lamps must contain any lamps in containers, and those containers must remain closed. See 35 IAC § 733.113(d)(1) [40 CFR § 273.13(d)(1)].

At the time of the inspection, one container of used bulbs was open without anyone present adding or removing waste; and there was one used bulb in a cardboard recycling container. Please provide a management control document or statement that discusses the placing of universal waste in the appropriate containers and the closing of universal waste containers unless adding or removing wastes. Please provide a photo of your closed containers of universal waste if you currently have universal waste in your universal waste storage area.

5. A small quantity generator of universal waste must mark or label the container of universal waste with the earliest date that any universal waste within the container became a waste or was received, or mark or label each item of universal waste with the date it became a waste or was received. See 35 IAC § 733.113(c) [40 CFR § 273.15(c)].

At the time of the inspection, Rhodia did not have accumulation start dates marked on the containers of used bulbs; or marked on the container with used ballasts or marked on the each individual used ballast. Please provide a management control document or statement that directs employees to place the accumulation start date on containers of universal waste or on individual pieces of universal waste. Please provide a photo of such dating if universal waste is currently in your universal waste storage area.

To be eligible for a generator exemption from having a hazardous waste storage permit, Rhodia must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. The requirements identified in violations 2 and 3 are generator permit exemption conditions. At this time, EPA is not requiring Rhodia to apply for a storage permit so long as it immediately establishes compliance with these conditions and the other requirements outlined above.

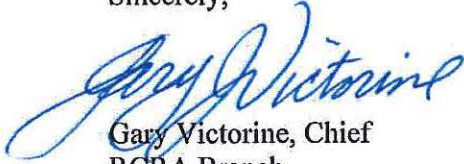
Concern

At the time of the inspection, Rhodia accumulated what appeared to be sulfur or other material above the molten sulfur tank in an outdoor area. This outdoor area had a berm which potentially allows the collection of rainwater. This configuration allows rainwater to mix with the sulfur or other material above the molten sulfur tank. There was also a sulfur odor in this area. EPA's concern is that rainwater mixing with the sulfur or other material may compromise the cover over the molten sulfur tank. Please provide a description of the area, the chemical properties of the sulfur or other material that was above the molten sulfur tank, and an explanation of how Rhodia will prevent breakthrough. Please provide a description of what Rhodia does with the sulfur or other material that forms above the molten sulfur tank (place back in the process, disposal, or something else?).

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact my staff, at (312) 886-9871.

Sincerely,



Gary Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA (todd.marvel@illinois.gov)

Chou, Jeffrey

From: Chachakis, Dan <chachakis.daniel@epa.gov>
Sent: Tuesday, February 26, 2013 9:46 AM
To: Chou, Jeffrey
Subject: RE: Rhodia Blue Island - Extension request for Response to Compliance Inspection Evaluation

Jeff,

Extension approved as we discussed: please submit the response no later than March 7, 2013.

Dan

DANIEL F. CHACHAKIS
Environmental Protection Specialist
U.S. EPA Region 5
(312) 996-9871

From: Chou, Jeffrey [mailto:Jeffrey.Chou@solvay.com]
Sent: Tuesday, February 26, 2013 9:39 AM
To: Chachakis, Dan
Subject: Rhodia Blue Island - Extension request for Response to Compliance Inspection Evaluation

Hi Dan,

Per our phone conversation this morning, this is our formal request for a 1-week extension to respond to U.S. EPA's Compliance Inspection Evaluation for Rhodia's Blue Island, IL facility. Thank you for the verbal approval – we will be submitting the response to you, no later than March 7, 2013. Please confirm this timeline is acceptable.

Thanks,
Jeff

Jeffrey Chou
Regional Environmental Engineer
708.235.7291 direct
708.382.1841 mobile
jeffrey.chou@solvay.com



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Appendix B
Signed Copy of Manifest 003056706FLE

6142

D72585454

SC PPW 10/5/2009

Form Approved OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 11 D 0 8 5 3 4 3 8 9 7	2. Page 1 of 2	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 003056706 FLE	
5. Generator's Name and Mailing Address Rhodia 14000 South Seeley Street Blue Island, IL 60406 (708) 371-2000			Generator's Site Address (if different than mailing address) SAME			
6. Generator's Phone: (708) 371-2000			U.S. EPA ID Number MAD039322250			
7. Transporter 1 Company Name Clean Harbors Environmental Services Inc			U.S. EPA ID Number OKD981588791			
8. Designated Facility Name and Site Address Clean Harbors El Dorado LLC 309 American Circle El Dorado, AR 71730 Facility's Phone: (870) 863-7173			U.S. EPA ID Number ARD069748192			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
	X	1. RO. UN1993. WASTE FLAMMABLE LIQUIDS. N.O.S. (METHANOL), 3, PG II	1	DM	1	6
	X	2. RO. UN2571. WASTE ALKYL SULFURIC ACIDS, 8, PG II (D002, D007)	46	DM	2476	6
	X	3. UN2796. WASTE SULFURIC ACID, 8, PG II	2	DF	110	6
	X	4. UN2796. WASTE SULFURIC ACID, 8, PG II	1	TP	275	6
13. Waste Codes D001 D002 D007 D002 D002						
14. Special Handling Instructions and Additional Information 1. CH187621 ERG#128 2. CH187619 ERG#156 45X55 1X1 3. CH381054 ERG#157 4. CH381054 ERG#157						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (2) (i) am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name Mike BERRY						
Signature [Signature]						
Month Day Year 11/09/09						
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name CARL E PROSSER					
	Signature [Signature]					
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name EMMANUEL KUFFOUR					
	Signature [Signature]					
	Month Day Year 11/11/09					
18. Discrepancy 18a. Discrepancy Indication Spec <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H050		2. H040		3. H040		4. H040
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name John Elliott						
Signature [Signature]						
Month Day Year 11/18/09						

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

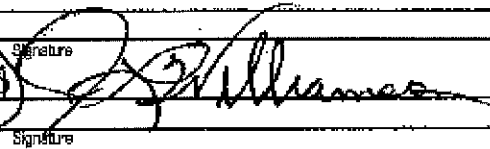
6142

D72585454

SC PPW 10/5/2009

Form Approved OMB No. 2050-0038

Please print or type. (Form designed for use on efile (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number ILD085343887	22. Page 2 of 2	23. Manifest Tracking Number 003056706FLE		
24. Generator's Name Rhodis						
25. Transporter 3 Company Name Clean Harbor Env. Services		U.S. EPA ID Number MD039322150				
26. Transporter Company Name		U.S. EPA ID Number				
GENERATOR	27a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt/Vol.	31. Waste Codes
	5. RD, UN1789, WASTE HYDROCHLORIC ACID SOLUTION, 8, PG II (0002)	62	TP	1450	G	0002
	6. N/A, NON D.O.T. REGULATED, NONE	1	DF	55	G	
32. Special Handling Instructions and Additional Information: 5. CH401585 ERG#157 6. CH382005						
TRANSPORTER	33. Transporter 3 Acknowledgment of Receipt of Material's Printed/Typed Name J.L. Williamson (agent for CHS)		Signature 		Month Day Year 11/2/09	
	34. Transporter Acknowledgment of Receipt of Material's Printed/Typed Name		Signature		Month Day Year	
DESIGNATED FACILITY	35. Discrepancy					
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems): 5. H040 6. H040					

Appendix C
Contingency (Emergency Response) Plan

Document Number: HSE-022	Title: Emergency Preparedness Plan	Revision Number: 15.0
Revision Date: 02/21/2013	Issuer: Mike Klootwyk/Phil McCray	Page: 1 of 30

Subject: **Emergency Preparedness Plan**

Purpose: To establish orderly procedures for an organized and timely response to emergency situations. The primary goal is to protect the health and safety of employees and contractors working in the Blue Island plant, others working or living around the Blue Island Plant, and any emergency workers respond to an emergency at the Blue Island plant. The secondary goal is to maintain the well being of the environment while reducing damage to the property. This plan will be shared with local emergency response agencies and these response agencies will be encouraged to conduct site visits to maintain familiarity with site operations,

Scope: The plan applies to all operations and activities conducted on the premises of Rhodia Blue Island Plant located at 14000 South Seeley Avenue Blue Island, Illinois 60406.

Responsibility: **Execution of the plan is the responsibility of all personnel on site.**
The plan delegates certain duties to be performed by specific job Duties/individuals. This Plan will be updated annual, or more often as needed by the HS Specialist.

Training: This procedure will be reviewed and training conducted annually. Training will also be provided to all employees following major revisions of this procedure.

1. Introduction

1.1. Location of Hardcopies / Distribution

Hardcopies of the procedure shall be stored in the SO3 Control Room, Building #3, and the Supervisor's Office, Plant Manager's office, Operations Manager office along the hardcopy of the SPCC Plan. Anytime the procedure is revised the hardcopies at the above locations must be replaced as well. Per RCRA Contingency Plan requirements, copies of HSE-022 are to be submitted to local fire, police, hospitals, and emergency planning agencies. A complete listing of agencies with addresses and a sample submittal letter is included in Appendix A.

4. EMERGENCY ASSIGNMENTS

Assignment	Name	Phone Numbers		
		Office	Cell	Home
Emergency Coordinator	Phil McCray	135	225/240-3718	815/534-5901
	Home Address	22069 Heritage Dr., Frankfort, IL 60423		
Alternate	Jesse Brunsvold	139	563/343-5363	
	Home Address	2222 W Diversey #413, Chicago, IL 60647		
Operations Officer	Mike Podolak	140	708/297-0194	
Alternate	Shift Supervisor	130	773/610-4327	
Safety Officer	Jesse Brunsvold	139	563/343-5363	815-806-7141
Alternate	Robert Eicke	112		219/926-1628
Security / Traffic	Robert Eicke	112		219/926-1628
Alternate	Mike Berkery	131	708/297-8341	
Maintenance	Kevin Macey	120	708/214-6295	
Alternate	Kendall Parish	122	708/224-8044	
Emergency coordinator (Nights)	Shift Supervisor	130	773/610-4327	
Alternate	Lead or SO3 Opr.			563/343-5363
Fire Chief	Dixmoor Fire Dept.	9-911	N/A	N/A

4.1. Emergency Coordinator - DaysDuties

- ☐ Coordinate emergency effort
- ☐ Receives head count
- ☐ Approves actions recommended by Operations Officer
- ☐ Coordinates telephone communications, as well as contacting outside agencies for additional assistance (communications)
- ☐ Providing for release of information as required by Corporate Policy (Public Relations)
- ☐ Determines when an emergency is over and declares an "All Clear"
- ☐ Set up emergency command post in Bldg. #1 office or Bldg.#3, as emergency dictates
- ☐ Calls CAERS
- ☐ Notify Illinois Emergency Service & Disaster Agency
- ☐ Notify EPA, MSD, IEPA, etc.
- ☐ Contact railroad (IHB)
- ☐ Contact families of injured personnel
- ☐ Notify neighbors (Chicago Magnesium, 708-597-1300)
- ☐ Call in outside clean-up crew if needed

6.1. Fires/Explosions

If there is any doubt about whether a fire/explosion can be contained, activate nearest pull station (alarm). A small fire/explosion can grow to a large fire quickly. Attack any emergency situation in pairs; if one person is injured, the other can pull him/her out.

If a fire extinguisher will not put out the fire, leave it. We will rely on the Fire Department or the sprinkler system to extinguish it. The Fire Department is trained to handle fires/explosions, not plant personnel.

An appropriate incident report must be made within 24 hours of any and all incidents.

6.2. Sprinkler System

Once the sprinkler system is activated the Fire Department must give authorization to close the sprinkler valve; therefore, someone must be assigned to stay at the valve. If a fire starts while the valve is closed, that person should immediately open it. Responsibility for this function is held by the Maintenance Manager or his designee.

If sprinklers do not have adequate flow, the fire pump may not have started. To start the fire pump manually turn on the emergency fire pump switch, located in the fire pump house on the north wall, lower east corner of the breaker box.

6.3. Chemical Spill or Vapor Release

It is important for plant supervision to know when to report an accidental release. There are three classes of releases, which this plant might face.

- The first type of event is when it is extremely clear that an accidental air emission will travel beyond the plant boundaries and will or could conceivably be seen, smelled in any way and has an acute effect upon people outside the plant. These incidents should be reported to the Dixmoor Fire Department immediately, with as much accurate information as is available at that moment.
- The second type of event is when it is extremely clear that an accidental air emission will not travel beyond the plant boundary so as to be visible or in any way have an acute effect upon nearby people. These incidents would not necessarily have to be reported to community emergency services. However, reporting to regulatory agencies may be needed. Follow the BI Incident Reporting procedure located on the "G" drive.

11. Revisions

Rev. Number	Description	Date
5	Added sections 7 and 8 that describe the duties that personnel shall perform in the event of an electrical power outage and power restored Updated names and contact numbers Assigned responsibility of contacting Building #3 to shift supervisor, Added description of city water back-up supply, and eliminate the assignment of sprinkler captains. Updated Section 1.5 to use 911 to summon services outside of the fire department Added section on injury reporting Added locations for tornado shelter Updated duties for various positions	8/13/08
6	Changed Maintenance Manager title to Maintenance Team Leader Minor updates to contact info. Added Appendix A – listing of agencies to receive a copy of HSE-022	1/28/09
7	Added instructions for manually starting the fire pump Added location of the disconnect for the fire pump system Added instruction to call 911 after alarm activates to inform responders of the type of emergency	1/28/09
8	Updated names and contact numbers Reference SHP-327 for reporting bomb threats	3/26/09
9	Updated names and contact numbers due to staffing changes	10/19/09
10	Updated names and contact numbers due to staffing changes	6/4/10
11	Updated names and contact numbers due to staffing changes	12/10/10
12	Updated names and contact numbers due to staffing changes	3/30/11
13	Updated names and contact numbers due to staffing changes Updated Responsibilities Updated section 1.2, "Day, Night and Weekend Response" Inserted RQ list in section 6.3 Updated Section 2, "Head Count persons and alternates. Updated Section 4, "Emergency assignments Updated and confirmed External Emergency Response contact numbers	11/01/12
14	Corrections – Page 2, Section 1.5 & Page 28, Attachment Fire and Police phone number. Cover letter page 27, added ext. 135 after the plant phone number Page 19, Section 7.4.5 Change insurance company name from Alliance to FM Global	11/13/2012
15	Updated home addresses for Emergency Coordinator and Alternate; updated response language pertaining to explosions; added list of emergency equipment and locations (Appendix B).	2/21/2013

Appendix B – List of Emergency Equipment and Locations

Type of Equipment	Location	Brief Description
Safety Showers / Eyewash	Building 1	Supplies water to wash away irritants and chemicals that have been introduced to eyes and body.
	first floor	
	SS eyewash in boiler room	
	by water softener	
	eyewash in basement by elevator	
	by railcar pumps	
	Building 2	
	By 622-520A 2nd floor by stairs	
	I/S building 2 by pollution system	
	outside lab door by tank 224	
	quality control laboratory	
	outside SO3 control room	
	SO3 south wall by ESP	
	O/S building 2 by HCl tank	
	1st floor next to T-247	
	1st floor XP room south wall	
	1st floor in front of T5200	
	by sink on CSA deck	
	2nd floor mezzanine near T-233	
	on deck by blend tanks	
	2nd floor XP room by doorway	
	2nd floor XP room south wall	
	on deck O/S CSA control room	
	2nd floor next to T240	
	2nd floor XP room north wall	
	above 6E by roof	
	half mole pump house	
	2nd floor near near Sul acid day tank	
	2nd floor in front of caustic wash tank	
	eyewash in building 2 aqueous lab	

Appendix B – List of Emergency Equipment and Locations (continued)

Type of Equipment	Location	Brief Description
Safety Showers / Eyewash	Outside	Supplies water to wash away irritants and chemicals that have been introduced to eyes and body.
	flammable storage building	
	alcohol pump house	
	O/S building 2 by SO3 pump house	
	SO3 pump house	
	building 2 old pump house	
	Building 3	
	by scale	
Fire water pump	Pump house between Bldg 2 and 3	Provides water as emergency fire protection to various areas of plant.
Jockey pump	Pump house between Bldg 2 and 3	
Fire water tank	Outside between Bldg 2 and 3	
Risers	One each in Bldg 1, 2, 3	
Hydrant	Behind Bldg 2	
Fire monitor	Pump house between Bldg 2 and 3	
Sprinklers	Various	
Spill kits	Bldg 1 maintenance shop	Provides spill protection, absorbent materials, etc in event of chemical spill
	Bldg 2 - various	
	Bldg 3	
	Outside - near haz waste shed	

Appendix D
Waste Management Procedure and Supporting Pictures of
ESP Single Point Lesson (SPL) and Universal Waste Container



Document Number: HSE-058	Title: Waste Management Procedure	Revision Number: 1.0
Revision Date: 02/21/2013	Issuer: Jeffrey Chou/Phil McCray	Page: 1 of 4

Subject: **Waste Management Procedure**

Purpose: To manage waste materials in accordance with state and federal universal waste regulations (35 IAC Part 733 and in 40 CFR Part 273), hazardous waste regulations (35 IAC Part 722 and 40 CFR Part 262), and used oil regulations (35 IAC Part 739 and 40 CFR Part 112).

Scope: This program covers regulated waste materials typically or periodically generated at the Blue Island facility including batteries, mercury wastes, fluorescent bulbs, Electro-Static Precipitator (ESP) acid waste, lab waste, paint, non-empty aerosol cans, and used oil.

Responsibility: **Execution of the plan is the responsibility of all personnel on site.**
It shall be the responsibility of all employees and contractors to understand and follow this procedure. Supervision, Engineers, HSE and Managers are expected to support and enforce the requirements of this procedure.

Training: This procedure will be reviewed and training conducted annually.
Training will also be provided to all employees following major revisions of this procedure.

1.0 Universal Waste Management

In Illinois, Universal Waste includes the following five categories:

- Spent Batteries;
- Mercury thermostats;
- Lamps – fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps;
- Mercury Containing Equipment – mercury switches, mercury relays, and scientific instruments/instructional equipment containing mercury added during their manufacture
- Pesticides

Rhodia generates spent batteries, used lamps, mercury thermostats, and mercury-containing equipment. Universal waste regulations can be found in Illinois Administrative Code 35 Part 733 and in 40 CFR Part 273.

Rhodia is classified as a Small Quantity Handler of Universal Waste (SQHUW). A SQHUW is a handler that does not accumulate more than 11,000 pounds (5,000 kilograms) of Universal Waste at any time. A SQHUW is not required to notify IEPA or U.S. EPA of its Universal Waste handling activities.

Universal waste must be managed in a way that prevents releases to the environment. Waste containers must be in good condition, compatible with the waste contents, and kept closed when not adding or removing wastes. Containers must be labeled and marked with the earliest date of accumulating universal waste within the container. Universal waste may be accumulated on site for no longer than one year.

2.0 Hazardous Waste Management

The Rhodia Blue Island site manages the following hazardous wastes: ESP waste, flammable lab waste, waste paint, and aerosol cans. Hazardous waste regulations can be found in Illinois Administrative Code 35 Part 722 and in 40 CFR Part 262.

Rhodia is classified as a Large Quantity Generator (LQG) of Hazardous Waste. A LQG of hazardous waste is a generator that accumulates 2,200 pounds (1,000 kilograms) or more of hazardous waste in a calendar month. Except for waste accumulation in satellite accumulation areas, a LQG may accumulate hazardous waste on site for no longer than 90 days. The 90-day accumulation area shed must be inspected at least once per week.

Wastes may be accumulated in containers at or near the point of generation and under control of the operator of the process generating the waste, in areas not subject to the 90-day restriction. These areas are classified as satellite accumulation areas. Up to 55 gallons of waste may be accumulated in these areas prior to transfer to the 90-day accumulation area shed. Once 55 gallons of waste is accumulated, the wastes must be dated and moved to the outdoor shed within three days. The lab, the ESP, and the Building 1 waste storage area for aerosol and paint cans are managed as satellite accumulation areas.

Hazardous waste must be managed in a way that prevents releases to the environment. Waste containers must be in good condition, compatible with the waste contents, and kept closed when not adding or removing wastes. A single point lesson (SPL) has been specifically developed for the ESP waste stream and is posted near the ESP satellite accumulation area in Building 2.

3.0 Labeling

All waste containers must be clearly labeled or marked depending on the type of waste contained.

Use the following terminology for labeling waste containers:

Batteries – “Universal Waste-Battery(ies),” “Waste Battery(ies),” or “Used Battery(ies)” on a non-hazardous waste label.

Thermostats – “Universal Waste-Mercury Thermostats,” “Waste Mercury Thermostats,” or “Used Mercury Thermostats” on a non-hazardous waste label.

Lamps – “Universal Waste-Lamps,” “Waste Lamps,” or “Used Lamps” on a non-hazardous waste label.

ESP Waste – “RQ, UN2571, Waste Alkylsulfuric Acids, 8, PGII, (D002, D007)” on a hazardous waste label. (Note that the RQ is 100 lb for D002 and 10 lb for D007 so review the RQ description if you are shipping a small container of waste).

Flammable Lab Waste – “RQ, UN1992, Waste Flammable Liquids, Toxic, N.O.S., (Methanol, Chloroform), 3, (6.1), PG II, (D001, D022)” on a hazardous waste label. (Note that the RQ is 100 lb for D001 and 10 lb for D022 so review the RQ description if you are shipping a small container of waste).

Paint – “Waste Paint” on a hazardous waste label if solvent-based or non-hazardous waste label if water-based paint. (Note that the actual shipping description will depend upon the characteristics of the various paints. Contact the site environmental engineer to determine the proper shipping name prior to disposal).

Aerosol Cans – “Flammable Aerosols” on a hazardous waste label. (Note that the actual shipping description will depend upon the contents of the cans. Contact the site environmental engineer to determine the proper shipping name prior to disposal).

Oil – “Used Oil” on a non-hazardous waste label.

4.0 Accumulation Time

Universal Waste may be accumulated for up to one year from the date it was generated. Hazardous waste (other than in satellite accumulation areas) may be accumulated for up to 90 days from the date it was generated.

5.0 Employee Training

All employees who handle or have responsibility for managing universal and hazardous waste must be informed of the proper handling and emergency procedures appropriate to the types of wastes handled at the facility. Training must be conducted on an annual basis.

6.0 Response to Releases

All releases or other residues of universal or hazardous waste must be immediately contained. A determination must be made as to whether any material resulting from a release is a hazardous waste. Consult the site environmental engineer for assistance with waste characterization.

7.0 Revisions

Rev. Number	Description	Date
1.0	Reformatted and completed procedure based on previous unapproved draft	2/21/13

Single Point Lesson Changing Out ESP Waste Drums

When to change drums

- Before AND after each SLS and AOS run
- Once a drum has been removed, do not reuse it (regardless of the level)
- Or when the weight reaches 475 lbs. (high alarm)

How to change drums

- Apply labels to new drum as shown
- Check Temp of drum in service
- Don the proper PPE:

Chemical resistant gloves

Respirator required if vent fan is not working or drum temperature is greater than 100F

- Close U/V-7402, close manual valve, and rotate discharge fitting 180 degrees



- Remove drip pan from full drum, and place on staged drum
- Place bung in full drum
- Date Haz waste label on current drum with a black SHARPIE marker. Do not use ink pen
- Move to Haz storage using drum picker



What if drum is hot?

- If drum temp is above 100F, set it back to the ESP to cool
- Date Haz waste label
- Inform Supervisor and note in logbook
- Place a plain white label on the drum with time, date, temp, & operator
- Allow drum to cool 24 hrs and transport to Haz storage

How to empty containment pit

- Check Pit if neutral pump is trash, if acidic, notify supervisor
- To empty pit: run discharge hose to appropriate area, and connect air supply to pump



UNIVERSAL WASTE

CONTENTS FLUORESCENT LIGHT
BULBS (UNBROKEN)

ACCUMULATION START DATE 01-28-2013

SHIPPER RHODIA INC.

ADDRESS 14000 S. SEELEY AVE

CITY, STATE, ZIP BLUE ISLAND, IL 60406

LAND AND CHEMICALS DIVISION

Type of Document: Notice of Violation

Name of Document: Rhodias Inc. NOV

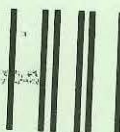
	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>[Signature]</u>	<u>01-17-2013</u>
SECTION APA:	<u>[Signature]</u>	<u> </u>
SECTION CHIEF: <i>acting</i>	<u>Michael [Signature]</u>	<u>1-18-13</u>
BRANCH APA:	<u>MC</u>	<u>1/18/13</u>
BRANCH CHIEF:	<u>[Signature]</u>	<u>1/18/13</u>
DIVISION APA:	<u> </u>	<u> </u>
DIVISION DIRECTOR:	<u> </u>	<u> </u>
OTHERS:	<u> </u>	<u> </u>
	<u> </u>	<u> </u>
DRA:	<u> </u>	<u> </u>
RA:	<u> </u>	<u> </u>

RETURN TO: Dan Chachakis, LR-8J

PHONE: 6-9871

COMMENTS:

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

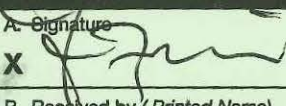
20 JAN 2013 10:05 AM
• Sender: Please print your name, address, and ZIP+4 in this box •

Daniel Chachakis
U.S. EPA/ Region 5/ LR-8J
77 W. Jackson Blvd
Chicago, IL 60604

RECEIVED
DIVISION FRONT OFFICE

JAN 29 2013

LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature X  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:		B. Received by (Printed Name)	C. Date of Delivery 1-28-13
Mr. Phillip McCoy / Plant manager Rhodia, Inc. / Blue Island Plant. Novocare 14000 South Seeley Avenue Blue Island, IL 60406		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Transfer from service label)		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
		7009 1680 0000 7679 6156	
PS Form 3811, February 2004		Domestic Return Receipt	
		102595-02-M-1540	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 24 2013

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7679 6156
RETURN RECEIPT REQUESTED

Philip McCray
Plant Manager
Rhodia, Incorporated
Blue Island Plant, Novecare
14000 South Seeley Avenue
Blue Island, Illinois 60406

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No.: ILD085343887

Dear Mr. McCray:

On July 18, 2012, a representative of the U. S. Environmental Protection Agency inspected Rhodia's facility located in Blue Island, Illinois (Rhodia). The purpose of the inspection was to evaluate Rhodia's compliance with regulations related to the generation, treatment, storage and disposal of hazardous waste, universal waste and used oil. We have enclosed a copy of the inspection report for your reference.

Based on information provided by Rhodia's personnel, review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that Rhodia is in violation of the following requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR):

1. A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage or disposal who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility must submit an exception report within 45 days of the date the waste was accepted by the initial transporter.

At the time of the inspection, Rhodia was missing the copy of manifest 003056706FLE from 2009 with the handwritten signature of the owner or operator of the designated facility. Rhodia was unable to provide an exception report for manifest 003056706FLE at the time of the inspection. Please provide a copy of manifest 003056706FLE with the handwritten signature of the owner or operator of the designated facility, or a copy of an exception report.

2. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided that while being accumulated on-site the generator maintains a contingency plan that:

a. Describes the actions facility personnel must take in response to fires, explosions or any planned or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility;

b. Lists the names, addresses and phone numbers of all persons qualified to act as emergency coordinators; and the generator

c. Includes a list of all emergency equipment at the facility, including the location and a physical description of each item on the list, and a brief outline of its capabilities.

See 35 IAC § 722.134(a)(4) referencing 35 IAC § 725.152 [40 CFR § 262.34(a)(4) referencing 40 CFR § 265.52]

At the time of the inspection, Rhodia's contingency plan did not describe the actions facility personnel must take in the event of an explosion; the contingency plan did not list the address of the emergency coordinator; and the contingency plan did not include a list of emergency equipment including the location and physical description of each item and a brief outline of its capabilities. Please provide a copy of an updated contingency plan that addresses the above.

3. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided that while being accumulated on-site the generator who accumulates hazardous waste in containers at or near any point of generation must keep the container closed unless adding or removing waste. See 35 IAC § 722.134(c)(1)(A) referencing 35 IAC § 725.273(a) [40 CFR § 262.34(c)(1)(i) referencing 40 CFR § 265.173(a)].

At the time of the inspection, Rhodia had a container at or near the point of generation in Building 2 that was not closed, and there was no operator present adding or removing waste. Please provide a management or engineering change that causes the container to be closed unless adding or removing waste. Please provide a picture of the container.

4. A small quantity handler of universal waste lamps must contain any lamps in containers, and those containers must remain closed. See 35 IAC § 733.113(d)(1) [40 CFR § 273.13(d)(1)].

At the time of the inspection, one container of used bulbs was open without anyone present adding or removing waste; and there was one used bulb in a cardboard recycling container. Please provide a management control document or statement that discusses the placing of universal waste in the appropriate containers and the closing of universal waste containers unless adding or removing wastes. Please provide a photo of your closed containers of universal waste if you currently have universal waste in your universal waste storage area.

5. A small quantity generator of universal waste must mark or label the container of universal waste with the earliest date that any universal waste within the container became a waste or was received, or mark or label each item of universal waste with the date it became a waste or was received. See 35 IAC § 733.113(c) [40 CFR § 273.15(c)].

At the time of the inspection, Rhodia did not have accumulation start dates marked on the containers of used bulbs; or marked on the container with used ballasts or marked on the each individual used ballast. Please provide a management control document or statement that directs employees to place the accumulation start date on containers of universal waste or on individual pieces of universal waste. Please provide a photo of such dating if universal waste is currently in your universal waste storage area.

To be eligible for a generator exemption from having a hazardous waste storage permit, Rhodia must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. The requirements identified in violations 2 and 3 are generator permit exemption conditions. At this time, EPA is not requiring Rhodia to apply for a storage permit so long as it immediately establishes compliance with these conditions and the other requirements outlined above.

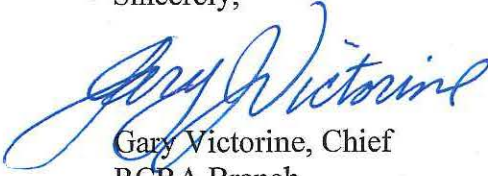
Concern

At the time of the inspection, Rhodia accumulated what appeared to be sulfur or other material above the molten sulfur tank in an outdoor area. This outdoor area had a berm which potentially allows the collection of rainwater. This configuration allows rainwater to mix with the sulfur or other material above the molten sulfur tank. There was also a sulfur odor in this area. EPA's concern is that rainwater mixing with the sulfur or other material may compromise the cover over the molten sulfur tank. Please provide a description of the area, the chemical properties of the sulfur or other material that was above the molten sulfur tank, and an explanation of how Rhodia will prevent breakthrough. Please provide a description of what Rhodia does with the sulfur or other material that forms above the molten sulfur tank (place back in the process, disposal, or something else?).

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact one of my staff, at (312) 886-9871.

Sincerely,



Gary Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA Branch, LR-8J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Rhodia Incorporated

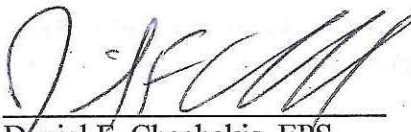
EPA ID NUMBER: ILD085343887

ADDRESS: 14000 South Seeley Avenue
Blue Island, Illinois 60406

DATE OF INSPECTION: July 18, 2012

EPA INSPECTOR: Daniel F. Chachakis
Environmental Protection Specialist (EPS)

PREPARED BY:


Daniel F. Chachakis, EPS
Compliance Section 1

8/29/2012
Date

ACCEPTED BY:


Lorna M. Jereza, Chief
Compliance Section 1

8/30/12
Date

Purpose of Inspection

This inspection was an evaluation of the Rhodia Incorporated's (Rhodia) compliance with hazardous waste regulations found at the Illinois Administrative Code (IAC) and the Code of Federal Regulations (CFR). The inspection was a U.S. Environmental Protection Agency (EPA) lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Inspector:

Daniel Chachakis, Civil Inspector, EPA

Site Representatives:

Philip McCray, Plant Manager, Blue Island Plant, Rhodia / Novacare
Jeffery Chou, Regional Environmental Engineer, Rhodia / Novacare

Introduction

I arrived at the site at approximately 7:50 AM. I introduced myself, presented my inspector credentials and identification, and described the purpose of the inspection and the process by which I intended to conduct the inspection. Mr. McCray provided me with a verbal description of the site, led the tour and provided me with the records we requested for review. Mr. McCray took part in the tour and records review.

I provided the EPA Small Business Resources information sheet and the Illinois Sustainable Technology Center pamphlet to Mr. McCray.

We discussed safety requirements. Personnel entering the site must wear a long sleeve shirt, safety glasses, a hard hat, safety boots with steel toe, and, if necessary, goggles for the lab areas.

We discussed my use of a camera and confidential business information (CBI). Mr. McCray stated that there was one potential area in the process line where pictures may involve CBI. Otherwise, Mr. McCray did not expect CBI to be an issue.

Site Description

Mr. McCray stated that Rhodia manufactures surface acting agents. He stated that there are approximately eight sites in North America that does this type of manufacturing. This Rhodia site in Blue Island, Illinois conducts continuous sulfation with heat, generating various surfactants used in other manufacturing companies' processes.

Mr. McCray stated the site has raw material tanks, product tanks, and intermediate mixing tanks.

Mr. McCray stated that the facility operates 24 hours a day, seven days a week, utilizing four 12 hour shifts. There are approximately 45 personnel on site. The site has been in continuous operation since 1906.

Mr. McCray stated that there is one major waste stream: a corrosive sulfonic type acid. There is also lab waste and universal waste (used bulbs). There are no hazardous waste storage tanks. There are underground storage tanks on-site, but they were closed and no longer in service.

Mr. McCray stated that there is one less-than 90-day hazardous waste storage area, and two satellite container areas.

Mr. McCray stated that there was one fire in 2011 where the facility activated the contingency plan procedures.

Mr. McCray stated that there is an on-site wastewater treatment unit for pH adjustment.

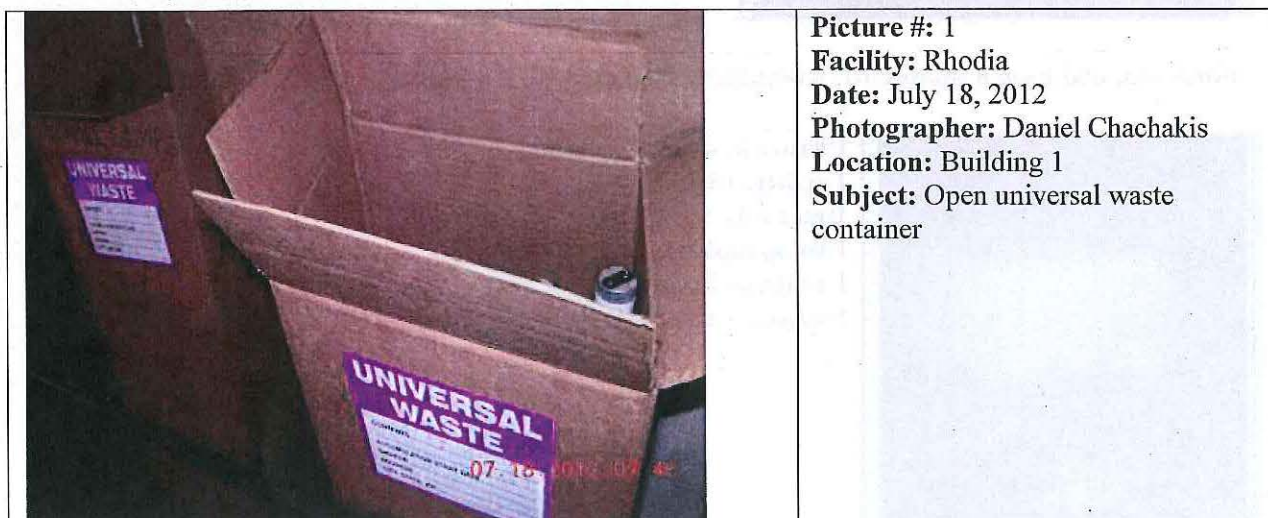
Site Tour

Mr. McCray escorted me on the site inspection tour where we observed satellite accumulation areas; the less than 90-day accumulation container storage area; and emergency equipment. I took photographs of the various waste operations and waste storage/accumulation areas during the inspection.

Building 1

Mr. McCray stated that this building contained administrative areas, maintenance areas and utilities.

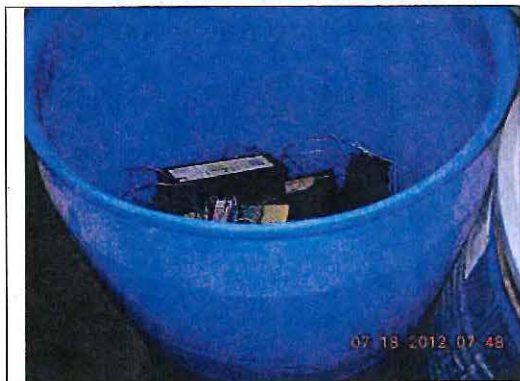
I observed, and took a picture of, an open container of universal waste storage (Picture 1). I observed that there were used bulbs in the container, but there was no accumulation start date marked on the container.



Add one hour to all times in the pictures.

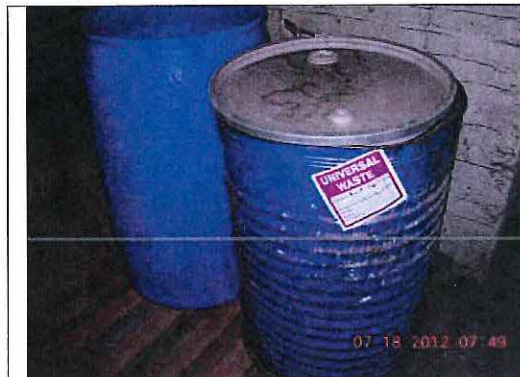
I observed that the container in Picture #1 marked with the words "Small Lamps" contained a number of used small lamps and used bulbs.

I observed, and took a picture of, a container without a label that contained ballast (Picture 2).



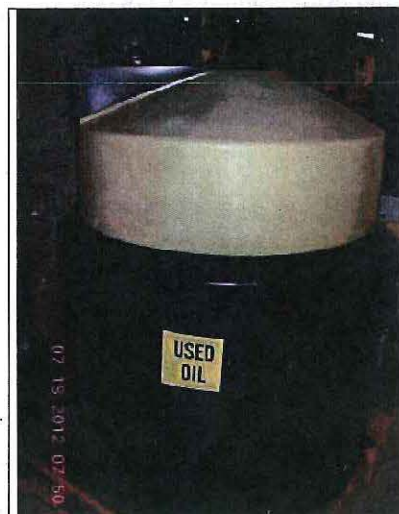
Picture #: 2
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Building 1
Subject: Open universal waste container

I observed, and took a picture of, a container with a universal waste label but marked with the words "Maintenance Trash" (Picture 3). When we opened that container, I observed that there was solid waste inside.



Picture #: 3
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Building 1
Subject: Open solid waste container with universal waste label

I observed, and took a picture of, a container labeled with the words "Used Oil" (Picture 4).



Picture #: 4
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Building 1
Subject: Used oil container

I observed the presence of fire extinguishers.

Outside between Buildings 1 and 2

I observed, and took a picture of, a cardboard recycling area (Picture 5). I found one used bulb, broken, in the cardboard recycling container. Mr. McCray immediately removed the used bulb from this area.



Picture #: 5
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Between Buildings 1 and 2
Subject: Cardboard recycling container

I observed, and took a picture of, raw material tanks (Picture 6).



Picture #: 6
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Between buildings 1 and 2
Subject: Storage tanks

I observed, and took a picture of, what Mr. McCray described as sulfur accumulation above a molten sulfur tank (Picture 7).



Picture #: 7
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Between buildings 1 and 2
Subject: Sulfur on ground

I smelled sulfur in this area. Mr. McCray stated that this is the burner section, where sulfur is converted to sulfate then mixed with other organic materials.

At this point, Mr. Chou took over as my escort for the rest of the site inspection tour.

Building 2

I observed, and took pictures of, a satellite container of hazardous waste (Pictures 8 and 9). I observed that in this configuration, the satellite container of D002 / D007 hazardous waste is always open.



Picture #: 8
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Building 2
Subject: Open satellite hazardous waste container (see Picture 9)

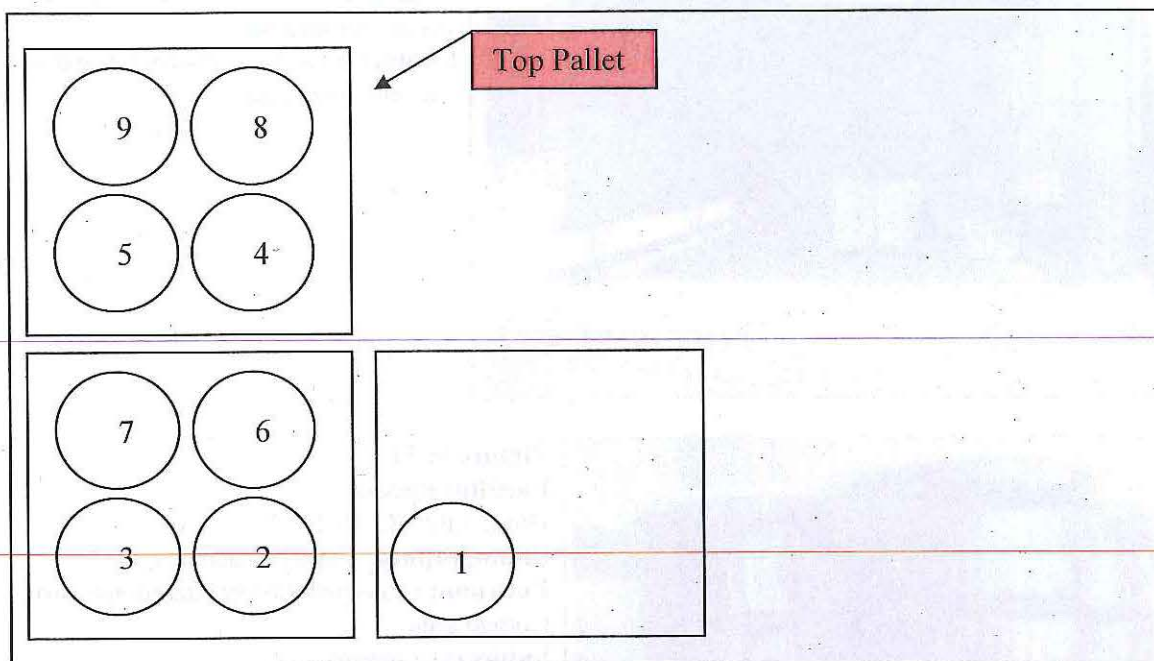
Brightness: +30%
Contrast: +20%



Picture #: 9
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Building 2
Subject: Satellite container of hazardous waste (see Picture 8)

Less-than 90-day hazardous waste storage area

I observed, sketched and took pictures of, the less-than 90-day hazardous waste storage area (Pictures 10 and 11).



Container #	H.W. Label	Date	Contents	Characteristic Code(s)
1	Yes	7/16/2012	Corrosive / Toxic	D002 / D007
2	Yes	7/13/2012	Corrosive / Toxic	D002 / D007
3	Yes	7/11/2012	Corrosive / Toxic	D002 / D007
4	Yes	7/15/2012	Corrosive / Toxic	D002 / D007
5	Yes	7-15/2012	Corrosive / Toxic	D002 / D007
6	Yes	7/14/2012	Corrosive / Toxic	D002 / D007
7	Yes	7/11/2012	Corrosive / Toxic	D002 / D007
8	Yes	Not Recorded	Not Recorded	Not Recorded
9	Yes	Not Recorded	Not Recorded	Not Recorded

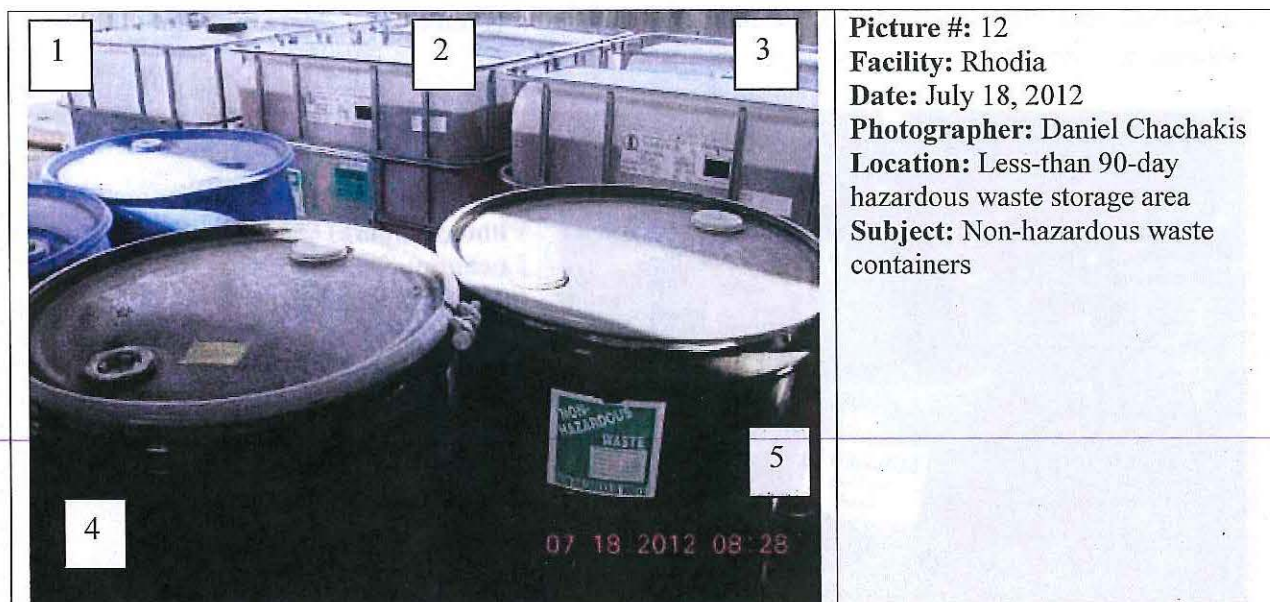


Picture #: 10
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Less-than 90-day hazardous waste storage area
Subject: Less-than 90-day hazardous waste storage area



Picture #: 11
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Less-than 90-day hazardous waste storage area
Subject: Container

I observed, and took a picture of, non-hazardous waste containers (Picture 12).



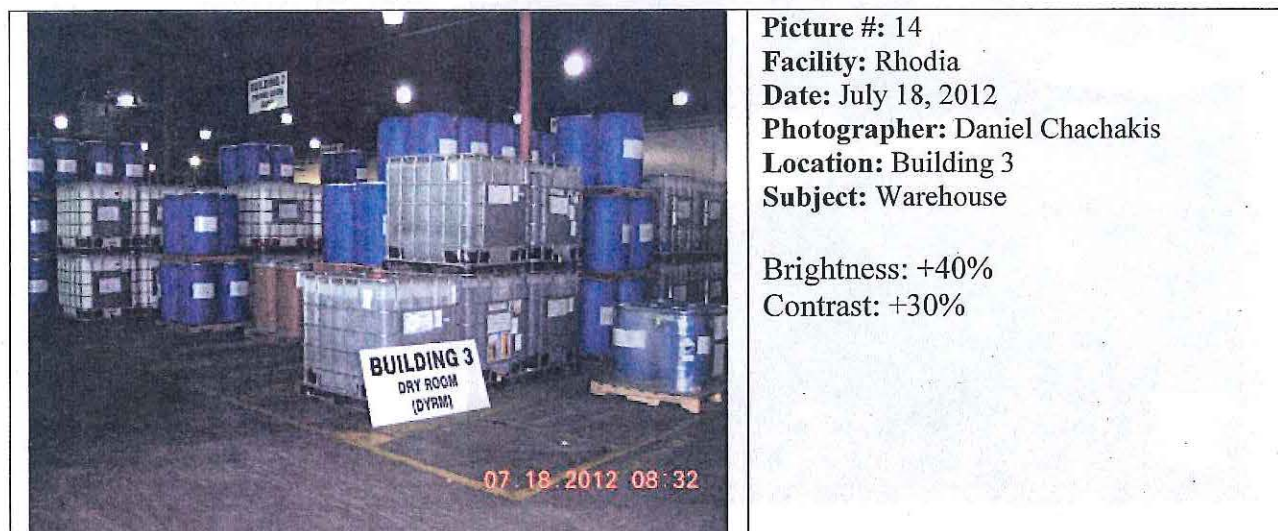
Container #	Contents	Comments
1	C12-18 Alkyl Amino Propyl Dimethylamine	581 pounds
2	C12-18 Alkyl Amino Propyl Dimethylamine	1,835 pounds
3	C12-18 Alkyl Amino Propyl Dimethylamine	1,848 pounds
4	ESP Decon Sludge	
5	ESP Decon Sludge	

I observed, and took a picture of, the inside of a spill kit (Picture 13).



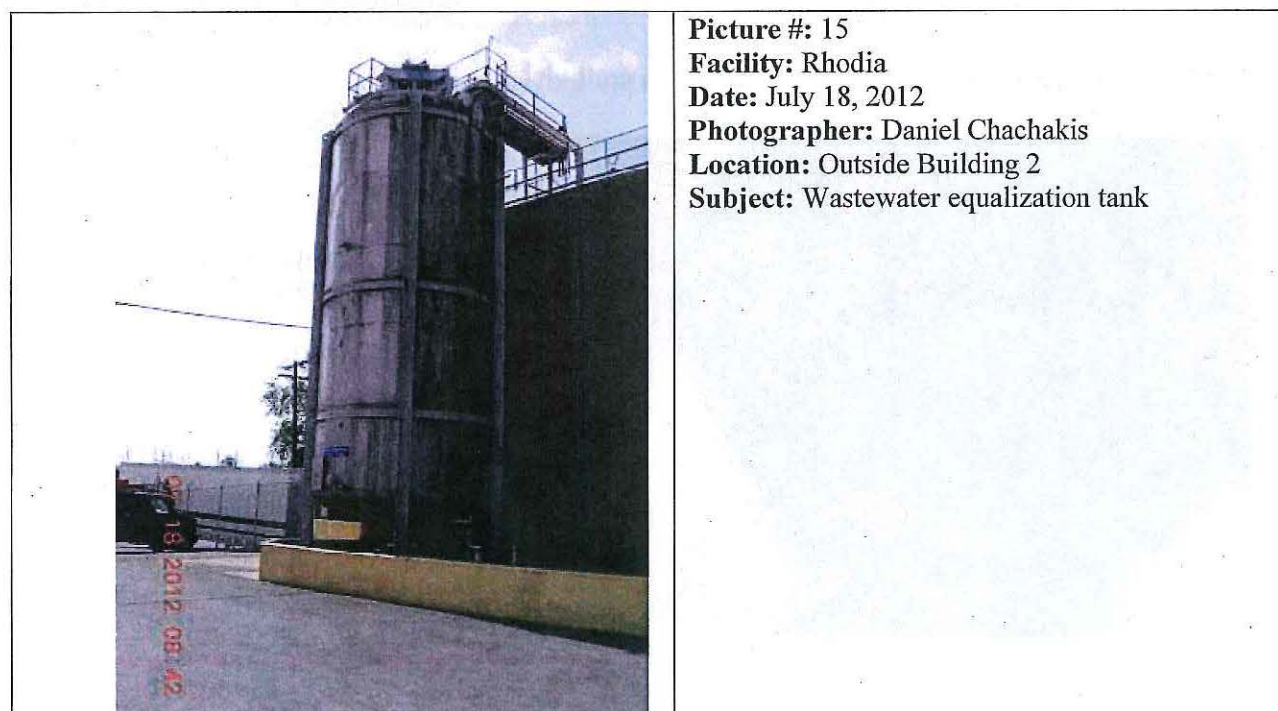
Building 3

I observed, and took a picture of, the inside of Building 3 (Picture 14). Mr. Chou stated the building is a warehouse.

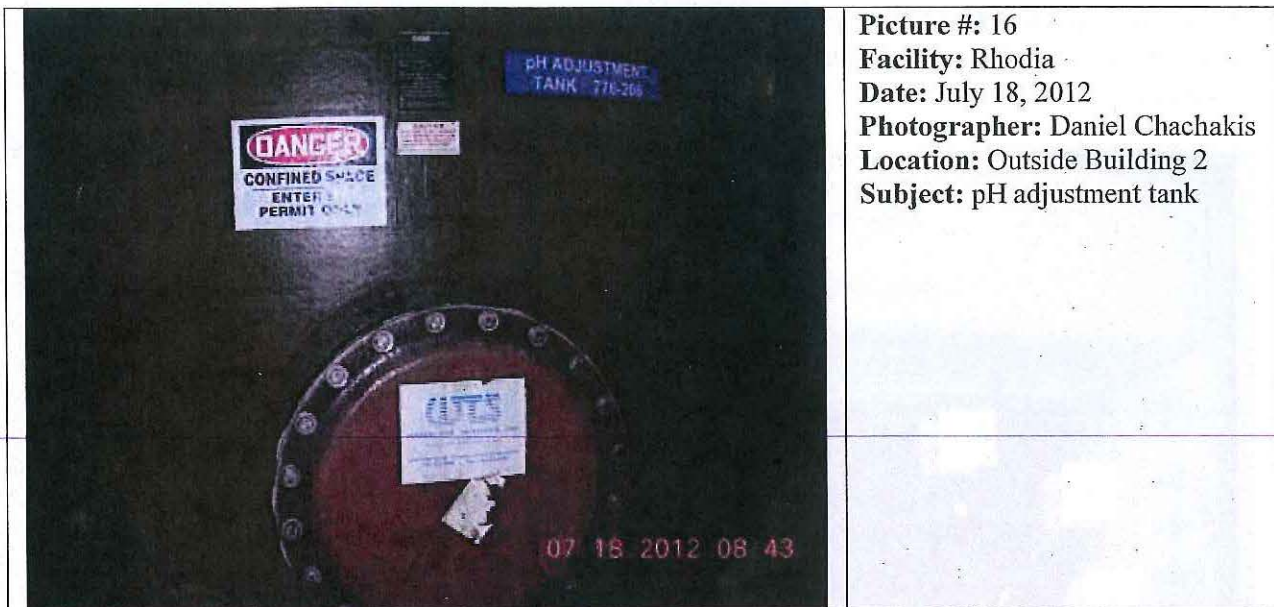


Outside Building 2

I observed, and took a picture of, what Mr. Chou described as a wastewater equalization tank (Picture 15).



I observed, and took a picture of, what Mr. Chou described as a pH adjustment tank (Picture 16).

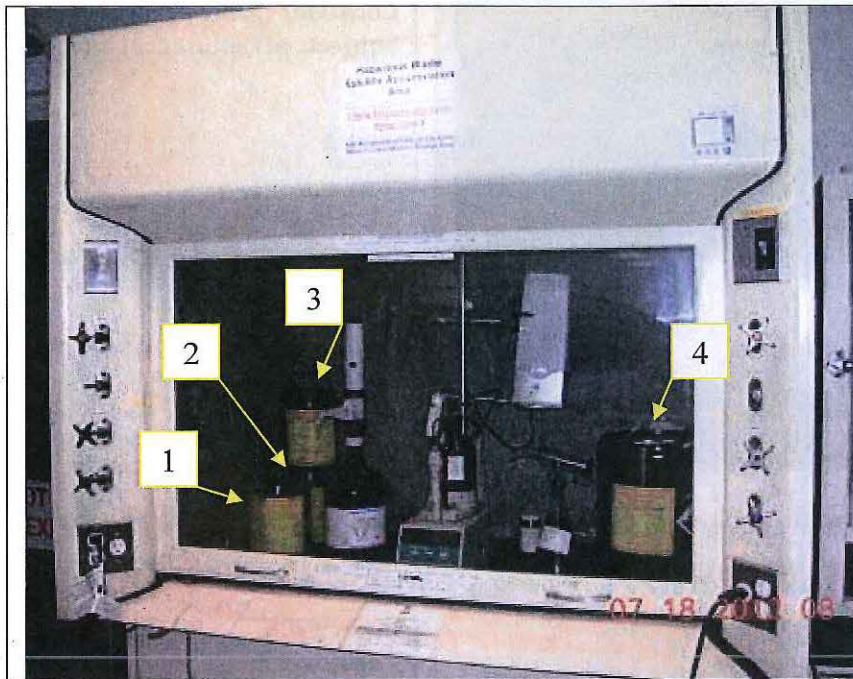


I observed, and took a picture of, the area where wastewater enters the sanitary sewer (Picture 17).



Building 2

I observed, sketched and took a picture of, a hazardous waste satellite container area for the lab area (Picture 18). We looked closer at each container to see if there was any material in the container.



Picture #: 18
Facility: Rhodia
Date: July 18, 2012
Photographer: Daniel Chachakis
Location: Building 2 Lab
Subject: Hazardous waste satellite container area

Container #	Contents	H.W. Codes
1	Waste Flammable Liquid (Methanol)	D001
2	Empty	
3	Empty	
4	Waste aryl sulfuric acid, Liquid	D002 / D007

I observed that there is a second floor to Building 2, where workers have access to approximately 60 tanks. We walked through the second floor of Building 2.

Records Review

I reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), weekly container inspection logs, daily tank inspection logs, and the contingency plan. I completed a Large Quantity Generator checklist during the records review. See Attachment.

Waste Report for 201: I recorded the following information from Rhodia's 2011 hazardous waste report.

Name of waste	H.W. codes	Amount
ESP Acid Waste	D002 / D007	131,922 pounds

Lab Waste	D001	183 pounds
MEA / Sodium Methylate Soiled Absorbent	D001	1,009 pounds
MEA / Sodium Methylate Blend	D001	1,376 pounds
ESP Waste Caustic	D002 / D007	364 pounds

I observed that the hazardous waste reports for 2009 and 2012 were on site and available for review. I recorded that Rhodia generated 10,189 gallons of D002 / D007 in 2009.

Manifests: Recorded the following information from the manifests.

- I recorded the names of the manifest signers for the facility, which included: Jeffery Chou, Mike Berkery, and Rick Edwards

Manifests 2012

Manifest #	Containers	H.W. Codes	Contents	Generator Date	TSDF Date
005231458 FLE LDR = Yes	1 DF / 55 gal 4 DM / 4 gal	D001 / D035 D001 / D022	Waste aerosols Methanol / chloroform	02/15/2012	02/25/2012
005216151 FLE LDR = Yes	6 DM / 6 gal 51 DM / 2,597 gal 4 DM / 220 gal 1 DF / 5 gal 1 DF / 1 lb 5 CF 120 lbs	D001 / D022 D002 / D007 D002 / D007 Universal waste Universal waste Universal waste	Methanol / chloroform Waste alkyl sulfuric acids Sodium hydroxide Batteries Mercury contained in articles Fluorescent light bulbs	04/26/2012	05/07/2012
005610357 FLE LDR = Yes	4 DM / 4 gal 52 DM / 2,656 gal 2 DM / 110 gal 3 CF / 60 lbs	D001 / D022 D002 / D007 D002 / D007 Universal waste	Methanol / chloroform Alkyl sulfuric acid Sodium hydroxide Light bulbs	07/11/12	Due in August 2012

Non-hazardous waste manifests 2012

Soap / oil / water sludge	1 TT	5,600 gal	01/09/2012
Soap / oil / water sludge	1 TT	5,363 gal	01/18/2012
Soap / oil / water sludge	1 TT	4,791 gal	02/02/2012
Soap / oil / water sludge	1 TT	5,200 gal	02/09/2012
Soap / oil / water sludge	1 TT	4,820 gal	02/14/2012
Soap / oil / water sludge	1 TT	5,500 gal	02/20/2012
Soap / oil / water sludge	1 TT	4,840 gal	02/24/2012
Soap / oil / water sludge	1 TT	5,360 gal	03/15/2012
Soap / oil / water sludge	1 TT	5,050 gal	03/13/2012
Soap / oil / water sludge	1 TT	5,428 gal	03/17/2012
Soap / oil / water sludge	1 TT	4,650 gal	03/30/2012
Soap / oil / water sludge	1 TT	4,569 gal	03/23/2012
Soap / oil / water sludge	1 TT	5,519 gal	03/24/2012
Soap / oil / water sludge	1 TT	5,200 gal	04/26/2012
Soap / oil / water sludge	1 TT	5,047 gal	04/11/2012
Soap / oil / water sludge	1 TT	6,083 gal	04/14/2012

Soap / oil / water sludge	1 TT	5,061 gal	04/20/2012
Soap / oil / water sludge	95 DF	5,225 gal	03/26/2012
Soap / oil / water sludge	1 TT	500 gal	05/17/2012
Soap / oil / water sludge	1 TT	36,140 lbs	05/03/2012
Soap / oil / water sludge	1 TT	5,300 gal	05/10/2012
Soap / oil / water sludge	1 TT	5,145 gal	05/04/2012
Soap / oil / water sludge	1 TT	5,587 gal	05/15/2012
Soap / oil / water sludge	1 TT	5,600 gal	05/25/2012
Soap / oil / water sludge	1 TT	5,390 gal	06/11/2012
Soap / oil / water sludge	1 TT	4,400 gal	06/04/2012

Manifests 2011

004868197FLE	004709444FLE
004791975FLE	000382901FLE
004731903FLE	004463270FLE

Manifests 2010

003942090FLE	003494891FLE
003942089FLE	003028975FLE
003425882FLE	003136200FLE
003425859FLE	003136199FLE
003396598FLE*	003136167FLE
003396597FLE	

* This manifest showed Clean Harbors as Transporter 1, where Clean Harbors signed for the hazardous waste on 07/22/10; and Robbie D. Woods as Transporter 2 where Robbie D. Woods signed for the waste on 08/04/10, a potential transporter storage period of 13 days.

Manifests 2009

003056706FLE*	002623684FLE
003010932FLE	002623682FLE
003010933FLE	002623665FLE
003010680FLE	002546463FLE
002623747FLE	

* TSD Facility to generator copy was not present at the time of the inspection.

Waste Profiles: Mr. Chou stated that the waste profiles are stored in an electronic form on-line. Two waste profiles I reviewed are the following:

- CH187619, ESP Acid Waste, pH ≤ 2, Chromium 5 mg/l, D002 / D007
- ESP Decon Sludge

Contingency Plan: I reviewed Rhodia's emergency response plan titled, "Standard Operating Procedure Emergency Preparedness Plan", effective date 01/07/2011. The plan lists Phil McCray and Jesse Brunsvold as the emergency coordinators and alternate.

I observed that the plan did not describe Rhodia's response to potential explosions. Also, the home address of the emergency coordinator and the alternate are not included in the plan.

Weekly Container Inspections: I reviewed weekly container inspection forms. I recorded the names of the facility's inspectors from the forms, which included Marco V., Wes, Craig Zmuda, M. Vargas, and Marly Rodriguez.

Training Program: I observed the presence of a new employee training program and an on-line training matrix for each employee. Rhodia has maintained electronic training records for the employees since 2007.

Closing Conference I conducted a closing conference with Mr. Chou and Mr. McCray. We summarized the satellite container, labeling, manifest, universal waste, and contingency plan issues identified during the inspection. The inspection concluded at approximately 12:45 PM.

Attachment
Checklist

ATTACHMENT

Checklist

7-18-2012

Rhodia, Inc.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> ILP 085 343887	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes _____ No _____ N/A <u>X</u>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A <u>X</u>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No <u>X</u> N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? <i>one container open, but provided vapor collection</i> Yes _____ No <u>X</u> N/A _____	Review
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <u>X</u>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>X</u>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>X</u>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <u>X</u> No _____ N/A _____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <u>X</u> No _____ N/A _____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No <u>X</u> N/A _____	See other parts / Section
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <u>X</u> No _____ N/A _____	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes _____ No <u>X</u> N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>X</u>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>X</u>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <u>X</u> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? <i>Container open, but provided w/ Vapor Collection</i> Yes _____ No <u>X</u> N/A _____	Review
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>X</u> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? <i>Written logs for review</i> Yes <u>X</u> No _____ N/A _____</p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <u>X</u> No _____ N/A _____</p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <u>X</u> No _____ N/A _____</p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <u>X</u> No _____ N/A _____</p> <p>COMMENTS: <i>One manifest, 003056706 FLE from 2009 Facility to Generator signature copy not in file</i></p>	
(725.278)	<p>Section 725.278 Air Emission Standards Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No <u>X</u> N/A _____</p> <p>Comments: <i>1 satellite container open w/ vapor collection</i></p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No <u>X</u> N/A _____</p> <p>Note: If "No", go to Subpart C.</p> <p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area? Yes _____ No _____ N/A <u>X</u></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>X</u></p> <p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A <u>X</u></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	<p><i>Review</i></p>
(725.211)		725.211
(725.214)		725.214
(725.290)		

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A <u>X</u>	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A <u>X</u> 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A <u>X</u> 3) existing corrosion protection measures? Yes _____ No _____ N/A <u>X</u> 4) documented age of the tank system? Yes _____ No _____ N/A <u>X</u> 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A <u>X</u> *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <u>X</u> Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A <u>X</u> Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A <u>X</u> 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A <u>X</u> 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A <u>X</u> 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A <u>X</u> 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A <u>X</u>	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A <u>X</u>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A <u>X</u></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A <u>X</u></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A <u>X</u></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A <u>X</u></p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A <u>X</u></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A <u>X</u></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A <u>X</u></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A <u>X</u></p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A <u>X</u></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A <u>X</u></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A <u>X</u></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A <u>X</u></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A <u>X</u></p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A <u>X</u></p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A <u>X</u></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <u>X</u></p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <u>X</u></p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <u>X</u></p> <p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <u>X</u></p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <u>X</u></p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A <u>X</u></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A <u>X</u></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A <u>X</u></p>	
(725.296(f))	<p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A <u>X</u></p> <p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A <u>X</u></p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <u>X</u></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <u>X</u></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A <u>X</u></p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A <u>X</u></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? <u>X</u> Yes _____ No _____ N/A <u>X</u> - Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>X</u></p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A <u>X</u></p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A <u>X</u></p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A <u>X</u></p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A <u>X</u></p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A <u>X</u></p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>X</u></p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <u>X</u></p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <u>X</u> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? <u>pull stations</u> Yes <u>X</u> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <u>X</u> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <u>X</u> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <u>X</u> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <u>X</u> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <u>X</u> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? <u>radios / cell phones</u> Yes <u>X</u> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <u>X</u> No _____ N/A _____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <u>X</u> No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes _____ No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes _____ No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <u>X</u> No _____ N/A _____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <u>X</u> No _____ N/A _____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <u>X</u> No _____ N/A _____	
(725.151(b))	Has there been a <u>fire</u> , explosion or release of hazardous waste? Yes <u>X</u> No _____ N/A _____ If "Yes", has the contingency plan been carried out immediately? Yes <u>X</u> No _____ N/A _____	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <u>X</u> No _____ N/A _____ - explosions? <u>Not specifically</u> Yes _____ No <u>X</u> N/A _____ - releases? Yes <u>X</u> No _____ N/A _____	<u>X</u>

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(d))	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? <i>Missing address</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Is the list of emergency equipment up-to-date? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>				X
(725.152(f))	Does the plan include: - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>				X
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.156)	If the facility has had a release, <u>fire</u> or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
Note: If the facility has had a release, explain in detail.					

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? <i>Emergency Response</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> response to fire or explosions? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? <i>New employee program</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.116(c))	Have facility personnel received an annual review of the initial training? <i>on line Training Matrix</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.116(d))	Are the following documents and records being maintained at the facility:	
	1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	4) records documenting that the training or job experience has been given to and completed by facility personnel? <i>2007 electronic</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.141(i)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A <u>X</u>	
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No <u>X</u> N/A _____	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No <u>X</u> N/A _____	722.142(a)(1) <u>X</u>
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <u>X</u>	722.142(a)(2) <u>X</u>
		722.143
SUBPART E: EXPORTS OF HAZARDOUS WASTE		
722.150	Is the generator an exporter of hazardous waste? Yes _____ No <u>X</u> N/A _____ If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <u>X</u>	
		722.150
SUBPART F: IMPORTS OF HAZARDOUS WASTE		
722.160	Is the generator an importer of hazardous waste? Yes _____ No <u>X</u> N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <u>X</u>	
		722.160
SUBPART G: FARMERS		
722.170	Is the generator a farmer? Yes _____ No <u>X</u> N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <u>X</u>	
		722.170
	COMMENTS:	

C.2

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Mr. Phillip McCoy / Plant manager
Rhodia, Inc. / Blue Island Plant - Novocare
14000 South Seeley Avenue
Blue Island, IL 60406

IL0085343887

LAND AND CHEMICALS DIVISION

Type of Document: Inspection Report

Name of Document: Rhodia Incorporated Inspection Report

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>Daniel Chachakis</u> <i>DC</i>	<u>8-21-12</u>
SECTION APA:	<u>Ruben Aridge</u> <i>RA</i>	<u>8/21/2012</u>
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BRANCH APA:	_____	_____
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DIVISION DIRECTOR:	_____	_____
OTHERS:	_____	_____
	_____	_____
DRA:	_____	_____
RA:	_____	_____

RETURN TO: _____

PHONE: _____

COMMENTS:

This fact sheet answers the most frequently asked health questions (FAQs) about sulfur dioxide. For more information, call the ATSDR Information Center at 1-888-422-8737. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It's important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

HIGHLIGHTS: Exposure to sulfur dioxide occurs from breathing it in the air. It affects the lungs and at high levels may result in burning of the nose and throat, breathing difficulties, and severe airway obstructions. This chemical has been found in at least 16 of 1,467 National Priorities List sites identified by the Environmental Protection Agency (EPA).

What is sulfur dioxide?

(Pronounced sŭl' fər dī' ōk' sīd')

Sulfur dioxide is a colorless gas with a pungent odor. It is a liquid when under pressure, and it dissolves in water very easily.

Sulfur dioxide in the air comes mainly from activities such as the burning of coal and oil at power plants or from copper smelting. In nature, sulfur dioxide can be released to the air from volcanic eruptions.

What happens to sulfur dioxide when it enters the environment?

- ☐ When released into the environment, sulfur dioxide moves into the air.
- ☐ In the air, it can be converted to sulfuric acid, sulfur trioxide, and sulfates.
- ☐ Sulfur dioxide dissolves in water.
- ☐ Once dissolved in water, sulfur dioxide can form sulfurous acid.
- ☐ Sulfur dioxide can be absorbed into the soil, but we don't know if or how it moves in soil.

How might I be exposed to sulfur dioxide?

- ☐ Breathing air containing it or touching it.
- ☐ Working in industries where it occurs as a by-product, such as copper smelting or power plants.
- ☐ Working in the manufacture of sulfuric acid, paper, food preservatives, or fertilizers.
- ☐ Living near heavily industrialized activities where sulfur dioxide occurs.

How can sulfur dioxide affect my health?

Exposure to very high levels of sulfur dioxide can be life threatening. Exposure to 100 parts of sulfur dioxide per million parts of air (100 ppm) is considered immediately dangerous to life and health. Burning of the nose and throat, breathing difficulties, and severe airway obstructions occurred in miners who breathed sulfur dioxide released as a result of an explosion in a copper mine.

Long-term exposure to persistent levels of sulfur dioxide can affect your health. Lung function changes were seen in some workers exposed to low levels of sulfur dioxide for 20 years or more. However, these workers were also exposed to other chemicals, so their health effects may not have been from sulfur dioxide alone. Asthmatics have also been shown

ToxFAQs Internet address via WWW is <http://www.atsdr.cdc.gov/toxfaq.html>

to be sensitive to the respiratory effects of low concentrations of sulfur dioxide.

Animal studies also show respiratory effects from breathing sulfur dioxide. Animals exposed to high concentrations of sulfur dioxide showed decreased respiration, inflammation of the airways, and destruction of areas of the lung.

How likely is sulfur dioxide to cause cancer?

There are no studies that clearly show carcinogenic effects of sulfur dioxide in people or animals. Studies have investigated workers in the copper smelting and pulp and paper industries, but the results are inconclusive since the workers were also exposed to arsenic and other chemicals. The one available animal study suggests that sulfur dioxide may be a carcinogen in mice. The International Agency for Research on Cancer (IARC) has classified sulfur dioxide as Group 3, not classifiable as to human carcinogenicity.

How can sulfur dioxide affect children?

Children who live in or near heavily industrialized areas where sulfur dioxide occurs may experience difficulty breathing, changes in the ability to breathe deeply, and burning of the nose and throat. It is not known whether children are more vulnerable to these effects than adults. However, children may be exposed to more sulfur dioxide than adults because they breathe more air for their body weight than adults do.

Long-term studies surveying large numbers of children indicate that children who have breathed sulfur dioxide pollution may develop more breathing problems as they get older, may make more emergency room visits for treatment of wheezing fits, and may get more respiratory illnesses than other children. Children with asthma may be especially sensitive even to low concentrations of sulfur dioxide, but it is not known whether asthmatic children are more sensitive than asthmatic adults.

How can families reduce the risk of exposure to sulfur dioxide?

Families living near heavily industrialized areas where sulfur dioxide occurs should limit their outdoor activities during times of high air pollution. By paying attention to news bulletins and air pollution advisories, families can control the amount of their exposure. People with respiratory difficulties should pay special attention to these warnings, and asthmatic children's outdoor exercise should be limited when high levels of sulfur dioxide are present in air.

Is there a medical test to show whether I've been exposed to sulfur dioxide?

Sulfur dioxide in the body is changed into other sulfur-containing chemicals in the body. These breakdown products can be measured in blood and urine, but this requires special equipment that is not routinely available in a doctor's office. Furthermore, exposure to chemicals other than sulfur dioxide can also produce sulfate, so the presence of sulfate breakdown products in your body does not necessarily mean you have been exposed to sulfur dioxide.

Has the federal government made recommendations to protect human health?

EPA has set an air quality standard of 0.03 ppm for long-term, 1-year average concentrations of sulfur dioxide. Short-term, 24-hour air concentrations should not exceed 0.14 ppm more than once a year.

The Occupational Safety and Health Administration (OSHA) has set a limit of 2 ppm over an 8-hour workday, 40-hour workweek.

References

Agency for Toxic Substances and Disease Registry (ATSDR). 1998. Toxicological profile for sulfur dioxide. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information? For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology, 1600 Clifton Road NE, Mailstop F-32, Atlanta, GA 30333. Phone: 1-888-422-8737, FAX: 770-488-4178. ToxFAQs Internet address via WWW is <http://www.atsdr.cdc.gov/toxfaq.html> ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.



US EPA Envirofacts Agency
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Click on the MAPPING INFO value to obtain mapping information for the facility.

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CITY: BLUE ISLAND CORPORATE LINK: No
STATE: IL COUNTY: COOK
ZIP CODE: 60406 MAPPING INFO: [MAP](#)
EPA REGION: 5

CONTACT INFORMATION

NAME	STREET	CITY	STATE	ZIP CODE	PHONE	TYPE OF CONTACT
CHARLES TUSKAN					7083712000 135	Public
SEAN SCHNEPPER	14000 S SEELEY AVE	BLUE ISLAND	IL	60406	7085752559	Permit
KIA ZUBER	14000 S SEELEY AVE	BLUE ISLAND	IL	60406	2199327651, 248	Permit
LADELLA WHITAKER	14000 S SEELEY AVE	BLUE ISLAND	IL	60406	7083712000	Permit
JOHN HELLGOTH					7083712000, 135	Permit
KIA ZUBER					7083725169	Permit
NATHAN MILLS					7083712000, 138	Permit
CHARLES TUSKAN					7083712000, 135	Permit
SEAN SCHNEPPER					7085752559	Permit

LIST OF NAICS CODES AND DESCRIPTIONS

NAICS CODE	NAICS DESCRIPTION
325188	ALL OTHER BASIC INORGANIC CHEMICAL MANUFACTURING
325611	SOAP AND OTHER DETERGENT MANUFACTURING
325613	SURFACE ACTIVE AGENT MANUFACTURING

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Data Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 12/27/2011
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Gray text in this report indicates information that is not required to be reported to EPA. These data, typically regarding non-major or smaller facilities, are often incomplete.

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110000432185	RHODIA INC	14000 SOUTH SEELEY AVENUE	BLUE ISLAND	IL	60406
TSCA	TSCA	100601865					
CAA	AFS	1703100150	RHODIA INC	14000 S SEELEY AVE	BLUE ISLAND	IL	60406
CAA	NEI	NEIIL0316373	RHODIA INC			IL	60406
CAA	NEI	NEIIL0316373	RHODIA INC			IL	60406
RCRA	RCR	ILD085343887	RHODIA INC	14000 S SEELEY AVE	BLUE ISLAND	IL	60406
EP313	TRI	60406WTCR14000	RHODIA INC	14000 S SEELEY AVE	BLUE ISLAND	IL	60406

Facility Characteristics

Data Dictionary

Statute	Source ID	Universe	Status	Areas	Permit Expiration Date	Latitude/ Longitude	Indian Country?	SIC Codes	NAICS Codes
	110000432185					LRT: 41.639350 , -87.670730	No		
CAA	1703100150	Synthetic Minor (Fed. Rep.)	Operating	FESOP - (NON-TITLE V) , SIP			NA	2843	325613
RCRA	ILD085343887	LQG	Active (H)				No		325613
EP313	60406WTCCR14000					37.5083 , -90.5083	NA	2843	325613

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

For the RCRA program, activities that contribute to an overall facility status of Active are displayed in parentheses using the acronym HPACS, where H indicates handler activities, P - permitting, A - corrective action, C - converter, and S - state-specific. More information is available in the Data Dictionary.

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	1703100150	0	04/20/2005	0	\$00
RCRA	ILD085343887	1	03/14/2007	0	\$00

Compliance Monitoring History (05 years)

Data Dictionary

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Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
TSCA / §6	1800107994	ICIS	PCB	EPA	05/11/2010	
RCRA	ILD085343887	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	03/14/2007	No Violations Or Compliance Issues Were Found

Entries in *italics* are not considered inspections in official counts.

Compliance Summary Data

[Data Dictionary](#)

Information on the nature of [alleged violations](#) is available on the FAQ page.

Statute	Source ID	Current SNC/HPV?	Description	Current As Of	Qtrs in NC (of 12)
CAA	1703100150	NO		11/12/2011	
RCRA	ILD085343887	No		11/09/2011	0

Three Year Compliance Status by Quarter

[Data Dictionary](#)

Violations shown in a given quarter do not necessarily span the entire 3 months. Information on the nature of [alleged violations](#) is available on the FAQ page, and information on the duration of non-compliance is available at the end of this report.

AIR Compliance Status												
Statute:Source ID	QTR1 Jan-Mar09	QTR2 Apr-Jun09	QTR3 Jul-Sep09	QTR4 Oct-Dec09	QTR5 Jan-Mar10	QTR6 Apr-Jun10	QTR7 Jul-Sep10	QTR8 Oct-Dec10	QTR9 Jan-Mar11	QTR10 Apr-Jun11	QTR11 Jul-Sep11	QTR12 Oct-Dec11
CAA: 1703100150												
HPV History												
Program/Pollutant in Current Violation												
FESOP - (NON-TITLE V)	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown				
SIP	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown				

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. V=Violation; S=Compliance Schedule.

RCRA Compliance Status												
Statute:Source ID	QTR1 Jan-Mar09	QTR2 Apr-Jun09	QTR3 Jul-Sep09	QTR4 Oct-Dec09	QTR5 Jan-Mar10	QTR6 Apr-Jun10	QTR7 Jul-Sep10	QTR8 Oct-Dec10	QTR9 Jan-Mar11	QTR10 Apr-Jun11	QTR11 Jul-Sep11	QTR12 Oct-Dec11
RCRA: ILD085343887												
Facility Level Status												
Type of Violation	Agency											

The first date displayed for a RCRA Violation corresponds to the violation determination date, and the next to the resolution date (if the violation has been resolved).

Notices of Violation or Informal Enforcement - AFS, PCS, ICIS-NPDES, RCRAInfo (05 year history)

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date
- No data records returned.				

Formal Enforcement Actions - (05 year history)

AFS, PCS, RCRAInfo, NCDB

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

ICIS

Data Dictionary

Primary Law/Section	Case Number	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
- No data records returned.										

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS-FE&C). These actions may duplicate records in the Formal Enforcement Actions section.

TRI History of Reported Chemicals Released in Pounds per Year at Site:60406WTCCR14000

Data Dictionary

Chemical releases reported to TRI are provided for context and are not associated with non-compliance for that facility.

Year /	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
2001	16,650				16,650		16,650
2002	21,959				21,959	1,000	22,959
2003	26,349				26,349	1,000	27,349
2004	5,536				5,536	1,208	6,744
2005	8,577				8,577	1,000	9,577
2006	8,353				8,353	1,158	9,511
2007	8,304				8,304	1,019	9,323
2008	21,792				21,792	1,022	22,814
2009	17,910				17,910	1,000	18,910

TRI Total Releases and Transfers by Chemical and Year

Chemical releases and transfers are in pounds except where otherwise noted.

Chemical Name	2001	2002	2003	2004	2005	2006	2007	2008	2009
CERTAIN GLYCOL ETHERS		1	10						
FORMALDEHYDE		10	10	10					
METHANOL	2,454	6,275	11,197	985	3,523	3,634	3,471	3,696	
CHLOROACETIC ACID		10	10	10					
DIETHANOLAMINE	7,232	7,236	7,232						
AMMONIA	6,004	7,537	7,285	5,739	5,815	5,770	5,729	18,992	18,900
SULFURIC ACID (1994 AND AFTER)	960	1,890	1,605		229	97	108	116	
MIXTURE					10	10	10	10	10
VANADIUM COMPOUNDS							5		

Demographic Profile of Surrounding Area (3 Miles)

Data Dictionary

Open more detailed information in a new window (links leave ECHO): [1 Mi](#) [3 Mi](#) or [5 Mi](#).

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA [Locational Reference Table\(LRT\)](#) when available.

Radius of Area:	3 Miles	Land Area:	98.48%	Households in area:	40,341
Center Latitude:	41.637473	Water Area:	1.52%	Housing units in area:	43,399
Center Longitude:	-87.671428	Population Density:	4389.04/sq. mi.	Households On Public Assistance:	3,015
Total Persons:	122,191	Percent Minority:	77.02%	Persons Below Poverty Level:	20,691

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	34,903 (28.56%)	Child 5 years and less:	12,708 (10.40%)
African-american:	76,528 (62.63%)	Minors 17 years and younger:	38,811 (31.76%)
Hispanic-Origin:	15,800 (12.93%)	Adults 18 years and older:	83,379 (68.24%)
Asian/Pacific Islander:	472 (0.39%)	Seniors 65 years and older:	11,627 (9.52%)
American Indian:	142 (0.12%)		

Other/Multiracial:		7,738 (6.33%)	
--------------------	--	----------------	--

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	5,757 (8.63%)	Less than \$15,000:	7,441 (18.45%)
9th-12th grades:	12,547 (18.82%)	\$15,000-\$25,000:	5,351 (13.26%)
High School Diploma:	21,501 (32.25%)	\$25,000-\$50,000:	13,308 (32.99%)
Some College/2-yr:	19,107 (28.65%)	\$50,000-\$75,000:	7,937 (19.67%)
B.S./B.A. or more:	7,768 (11.65%)	Greater than \$75,000:	6,390 (15.84%)

Notice About Duration of Violations -- The duration of violations shown on this report is an estimate of the actual duration of the violations that might be alleged or later determined in a legal proceeding. For example, the start date of the violation as shown in the ECHO database is normally when the government first became aware of the violation, not the first date that the violation occurred, and the facility may have corrected the violation before the end date shown. In some situations, violations may have been corrected by the facility, but EPA or the State has not verified the correction of these violations. In other situations, EPA does not remove the violation flag until an enforcement action has been resolved.



This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 11/12/2011. RCRAInfo: 11/09/2011. FRS: 11/10/2011. TRI: 01/27/2011. ICIS: 11/10/2011.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

[EPA Home](#) | [Privacy and Security Notice](#) | [Contact Us](#)



http://oaspub.epa.gov/enviro/fii_query_dtl_disp_program_facility?pgm_sys_id_in=ILD085343887&pgm_sys_acrm_in=BR
Last updated on Tuesday, December 27, 2011

Facility Registry System (FRS)

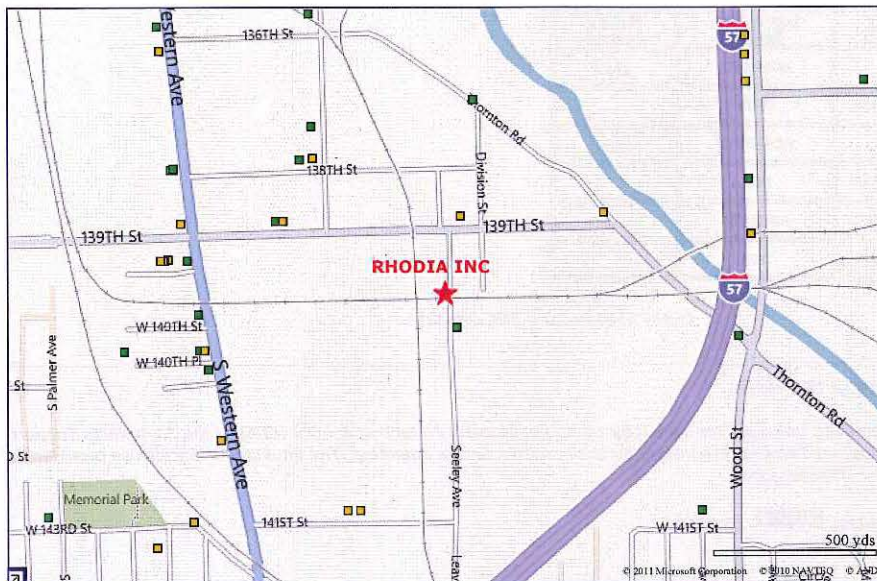
You are here: [EPA Home](#) [Envirofacts](#) [FRS](#) [Report](#)



Facility Detail Report



RHODIA INC
14000 SOUTH SEELEY AVENUE
BLUE ISLAND, IL 60406-3261
EPA Registry Id: 110000432185



Legend

- ★ Selected Facility
- EPA Facility of Interest
- State/Tribe Facility of Interest

The facility locations displayed come from the FRS Spatial Coordinates tables. They are the best representative locations for the displayed facilities based on the accuracy of the collection method and quality assurance checks performed against each location. The North American Datum of 1983 is used to display all coordinates.

Environmental Interests

Information System	Information System ID	Environmental Interest Type	Data Source	Last Updated Date	Supplemental Environmental Interests:
AGENCY COMPLIANCE AND ENFORCEMENT SYSTEMS	170000014464	STATE MASTER	ACES		-031024AAY AIR PROGRAM -0310660002 HAZARDOUS WASTE PROGRAM -0310660002 SOLID WASTE PROGRAM
AIR FACILITY SYSTEM	1703100150	AIR SYNTHETIC MINOR (ACTIVE)	AIRS/AFS	02/04/2011	
BIENNIAL REPORTERS	ILD085343887	HAZARDOUS WASTE BIENNIAL REPORTER	RCRAINFO	12/31/2007	
EMISSION INVENTORY SYSTEM (EIS)	7313811	CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY	EIS		
NATIONAL EMISSIONS INVENTORY	NEI2ILT\$9261	CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY	NEI		
NATIONAL EMISSIONS INVENTORY	NEIIL0316373	CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY	NEI		
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM	ILD085343887	LQG (ACTIVE)	NOTIFICATION (RCRA)	09/10/2009	
TOXIC RELEASE INVENTORY SYSTEM	60406WTCCR14000	TRI REPORTER	TRI REPORTING FORM	06/27/2011	
TOXIC SUBSTANCES CONTROL ACT	100601865	TSCA SUBMITTER	TSCA	12/31/2005	ICIS- ENFORCEMENT/COMPLIANCE ACTIVITY

Additional EPA Reports: [MyEnvironment](#) [Enforcement and Compliance](#) [Site Demographics](#) [Watershed Report](#)

Standard Industrial Classification Codes (SIC)

Data Source	SIC Code	Description	Primary
NEI	2843	SURFACE ACTIVE AGENTS, FINISHING AGENTS, SULFONATED OILS, AND ASSISTANTS	
FRS	2843	SURFACE ACTIVE AGENTS, FINISHING AGENTS, SULFONATED OILS, AND ASSISTANTS	
AIRS/AFS	2843	SURFACE ACTIVE AGENTS, FINISHING AGENTS, SULFONATED OILS, AND ASSISTANTS	
NEI	2841	SOAP AND OTHER DETERGENTS, EXCEPT SPECIALTY CLEANERS	

National Industry Classification System Codes (NAICS)

Data Source	NAICS Code	Description	Primary
RCRAINFO	325613	SURFACE ACTIVE AGENT MANUFACTURING.	
TRIS	325613	SURFACE ACTIVE AGENT MANUFACTURING.	
EIS	325613	SURFACE ACTIVE AGENT MANUFACTURING.	
FRS	325611	SOAP AND OTHER DETERGENT MANUFACTURING.	
NEI	325613	SURFACE ACTIVE AGENT MANUFACTURING.	
AIRS/AFS	325613	SURFACE ACTIVE AGENT MANUFACTURING.	

Facility Mailing Addresses

Affiliation Type	Delivery Point	City Name	State	Postal Code	Information System
OWNER	1 ABLE DR	CRANBURY	NJ	08512	RCRAINFO
FACILITY MAILING	14000 S	BLUE			

Congressional District Number:	01	ADDRESS	SEELEY AVE	ISLAND	IL	60406	TRIS
Legislative District Number:		FACILITY MAILING ADDRESS	14000 S SEELEY AVE	BLUE ISLAND	IL	60406	RCRAINFO
HUC Code/Watershed:	07120003 / CHICAGO	FACILITY MAILING ADDRESS	14000 S SEELEY AVE	BLUE ISLAND	IL	60406	AIRS/AFS
US Mexico Border Indicator:	NO	OPERATOR	ONE PARCO PL	BLUE ISLAND	IL	60406	RCRAINFO
Federal Facility:	NO						
Tribal Land:	NO						

Alternative Names		Contacts				
Alternative Name	Source of Data	Affiliation Type	Full Name	Office Phone	Information System	Mailing Address
RHODIA INC	AIRS/AFS	REGULATORY CONTACT	CHARLES TUSKAN	7083712000 135	RCRAINFO	
ALBRIGHT AND WILSON	RCRAINFO					
ALBRIGHT & WILSON AMERICAS	TRI REPORTING FORM	PUBLIC CONTACT	JEFFREY CHOU	7083821841	TRIS	

Organizations				
Affiliation Type	Name	DUNS Number	Information System	Mailing Address
OPERATOR	RHODIA INC		RCRAINFO	View
OWNER	RHODIA INC	002959810	TSCA	
OWNER	RHODIA INC		RCRAINFO	View
OWNER/OPERATOR	RHODIA INC	002959810	TRIS	
OWNER/OPERATOR		085343887	AIRS/AFS	
PARENT COMPANY	RHODIA INC	002959810	TRIS	

Query executed on: DEC-27-2011

Additional information for CERCLIS or TRI sites:

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- National Library of Medicine (NLM) [EXIT 112](#) TOXMAP



About us



Rhodia is a world leader in the development and production of specialty chemicals. We provide added-value products and high-performance solutions to diversified markets, including automotive, electronics, flavors and fragrances, health, personal and home care, consumer goods and industrial, through our 11 Global Business Units (GBUs).

Our strong geographic presence in high-growth markets, combined with the dedication of our 14,000 employees and our resolute commitment to sustainable development places Rhodia in the strongest of positions to face the challenges of today's industry.

Key figures 2010

- Sales: €5,226 million
- EBITDA (Earnings before interest, tax, depreciation and amortization): €905 million
- Group Net Share profit: 259 M€
- Employees: 14,000
- 65 production sites worldwide
- 32% of sales generated from products meeting the challenges of sustainable development

Leadership positions

Rhodia leads the world in the production of mild amphoteric surfactants, phosphorus chemistry and guar and derivatives, as well as in high-performance silicas, rare earth-based formulations and diphenols. We are number two in polyamides and the number three producer of cellulose acetate tow.

Rhodia is recognized as the major sulfuric acid regenerator in the US and, as one of the first companies to implement the Clean Development Mechanism of the Kyoto Protocol, we are at the forefront of combating climate change.

Organization

Rhodia's corporate structure is built around 11 Global Business Units:

- **Acetow** is a global producer of filter tow for making cigarette filters
- **Aroma Performance** produces aromas for the food market and intermediates for the perfumery, agro-food, electronics and life sciences markets
- **Coatis** develops oxygenated solvents and manufactures phenol-based products and derivatives specifically for the Latin American market
- **Eco Services** specializes in sulfuric acid production and regeneration services provided to oil refiners in North America
- **Energy Services** provides energy management services and develops "climate care" solutions.
- **Engineering Plastics** offers polyamide-based high-performance engineering plastics to the automotive, electrical and electronic, sportswear and leisure markets
- **Fibras** develops polyamide-based yarns for the Latin American market
- **Novecare** develops specialty surfactants and polymer-based solutions for the cosmetics, detergents, agrochemicals, coatings, oilfield and industrial applications markets
- **Polyamide & Intermediates** produces intermediates and polymers derived from the Polyamide 6.6 value chain
- **Rare Earth Systems** provides rare earth-based formulations for automotive catalysis, lighting and polishing
- **Silica** provides high performance silicas to global tire makers.

The company is headquartered in France and established in 25 countries worldwide. With manufacturing facilities and R&D centers in all four major regions of the world – Europe, North America, Latin America and Asia Pacific - Rhodia is dedicated to bringing the very best in innovation and service to our customers, as well as providing a vibrant and fulfilling working environment for our staff.



Sustainable Development: a powerful growth driver

Rhodia currently generates 32 percent of its sales with products that respond to the desire of customers and consumers for sustainable solutions.

- [Know more about sustainability](#)

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Rhodia Inc

14000 Seeley Avenue
Blue Island, IL 60406-3261 [map](#)

Website:

Rhodia.us

Phone:

(708) 371-2000

About Rhodia Inc

Is this your company? [Claim This Profile](#)

Rhodia Inc in Blue Island, IL is a private company categorized under Inorganic Acids Except Nitric and Phosphoric. Our records show it was established in and incorporated in Illinois. Current estimates show this company has an annual revenue of \$20 to 50 million and employs a staff of approximately 20 to 49.

- Business Categories**

Rhodia Inc Business Information

Business Information

Location Type Branch

State of Incorporation Illinois

Annual Revenue \$20 to 50 million

SIC Code

289905, Chemicals-Manufacturers

20 to 49

NAICS Code

325998, Other Misc Chemical Prod Manufacturing

Employees

At this location

42

Years in Business Information not found

Compliance Monitoring and Enforcement Pre-Inspection Report

Report run on: December 27, 2011 11:35 AM

Page 2

This report may contain enforcement sensitive data.

RHODIA INC

County Name / Code: COOK / IL031

ILD085343887

Location: 14000 S SEELEY AVE; BLUE ISLAND, IL 60406

Mailing: 14000 S SEELEY AVE; BLUE ISLAND, IL 60406

Activity Location: IL		State District:		Accessibility:		Non-Notifier:		Extract Flag: Y		Active Site: Y	
Generator:	LQG	Transporter:	N	Operating TSDF:	----	IC In Place:	N	EI Indicator (HE / GW):		N / N	
Short-Term Gen:	N	Transfer Facility:	N	Offsite Receiver:	N	HSM:	N	Subpart K:		----	
Full Enforcement:	----	Converter:	----	State Unaddressed SNC:	N	EPA Unaddressed SNC:	N				
CA Wrkld:	N	State TSDF:	-----	State Addressed SNC:	N	EPA Addressed SNC:	N				
Active State Gen:	N	Pclos Wrkld:	----	State SNC w/Comp Sched:	N	EPA SNC w/Comp Sched:	N				
Perm Prgrs:	----	Permit Renewal Wrkld:	----	Subj CA:	N	Subj CA Non-TSD:	N				
Perm Wrkld:	----	Permits GPRA:	N	Subj CA TSD 3004:	N			CA GPRA 2020:	N		
Clos Wrkld:	----	Renewals GPRA:	N	Subj CA TSD Discr:	N						

NAICS Codes:
325613

CM&E Evaluation History

CEI Evaluation	03/14/2007	Activity Location: IL	By: STATE	Identifier: MD1	Person: CXT	Suborganization: F2	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 03/14/2007	Focus Area:

No Linked Violations

CEI Evaluation	09/27/1984	Activity Location: IL	By: STATE	Identifier: 001	Person:	Suborganization:	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:

No Linked Violations

Latest Biennial Report Information

Report Cycle Year	Reported Status	Hazardous Waste Tons Generated	Hazardous Waste Tons Managed	Hazardous Waste Tons Shipped	Hazardous Waste Tons Received
2007	LQG	71.69	0.00	71.69	0.00

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
0	0		0	H040 - INCINERATION
EPA Waste Codes: D001				
0	0		0	H061 - FUEL BLENDING
EPA Waste Codes: D001				

Permitting Information

No Permitting Information Found

Compliance Monitoring and Enforcement Pre-Inspection Report

Report run on: December 27, 2011 11:35 AM

Version 5.0

User Selection Criteria

Handler ID:	ILD085343887
Location:	Regardless of where the activity occurred.
Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages: 6

Total Handlers: 1

Report Description

This report presents available information about Compliance, Monitoring and Enforcement information, latest Biennial Report information, Permitting information, and Corrective Action milestones at each facility meeting the criteria. This report may contain enforcement sensitive information.

Within each facility, the information is presented in the following order:

- Compliance, Monitoring and Enforcement Information - Presented by evaluation (latest evaluation first). Within the evaluations, violations detected and enforcement action addressing those violations are presented by the earliest date. Enforcements not linked to a violation are printed last, after all evaluations are printed for the facility.

- Biennial Report Summary Information (for current reporting cycle only)

- Permitting Information - Presented by permit sequence number, permit event code

- Corrective Action Milestones - Presented by Corrective Action event code

Report Information

Name:	cme_preinspection.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed:	March 2006
Last Updated:	November 2009
Contact:	rcrainfo.help@epa.gov
Tables Used:	hhandler5, cmecomp3, cevaluation_area, hreport_univ5, aarea4, aln_area_event4, aevent4, gpra_ca, hid_groups
Libraries:	

Compliance Monitoring and Enforcement Pre-Inspection Report

Report run on: December 27, 2011 11:35 AM

Page 4

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

Compliance Monitoring and Enforcement Pre-Inspection Report

Report run on: December 27, 2011 11:35 AM

Page 3

This report may contain enforcement sensitive data.

RHODIA INC, ILD085343887, BLUE ISLAND, IL, continued -

Corrective Action Milestones

No Corrective Action Information Found

Total Number of Handlers:	1
---------------------------	---

Total Number of Activity Locations:	1
-------------------------------------	---

*** End of Report ***

Compliance Monitoring and Enforcement Pre-Inspection Report

Report run on: December 27, 2011 11:35 AM

Page 6

This report may contain enforcement sensitive data.

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

By
By indicates the agency who performed the evaluation/inspection.

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Compliance Monitoring and Enforcement Pre-Inspection Report

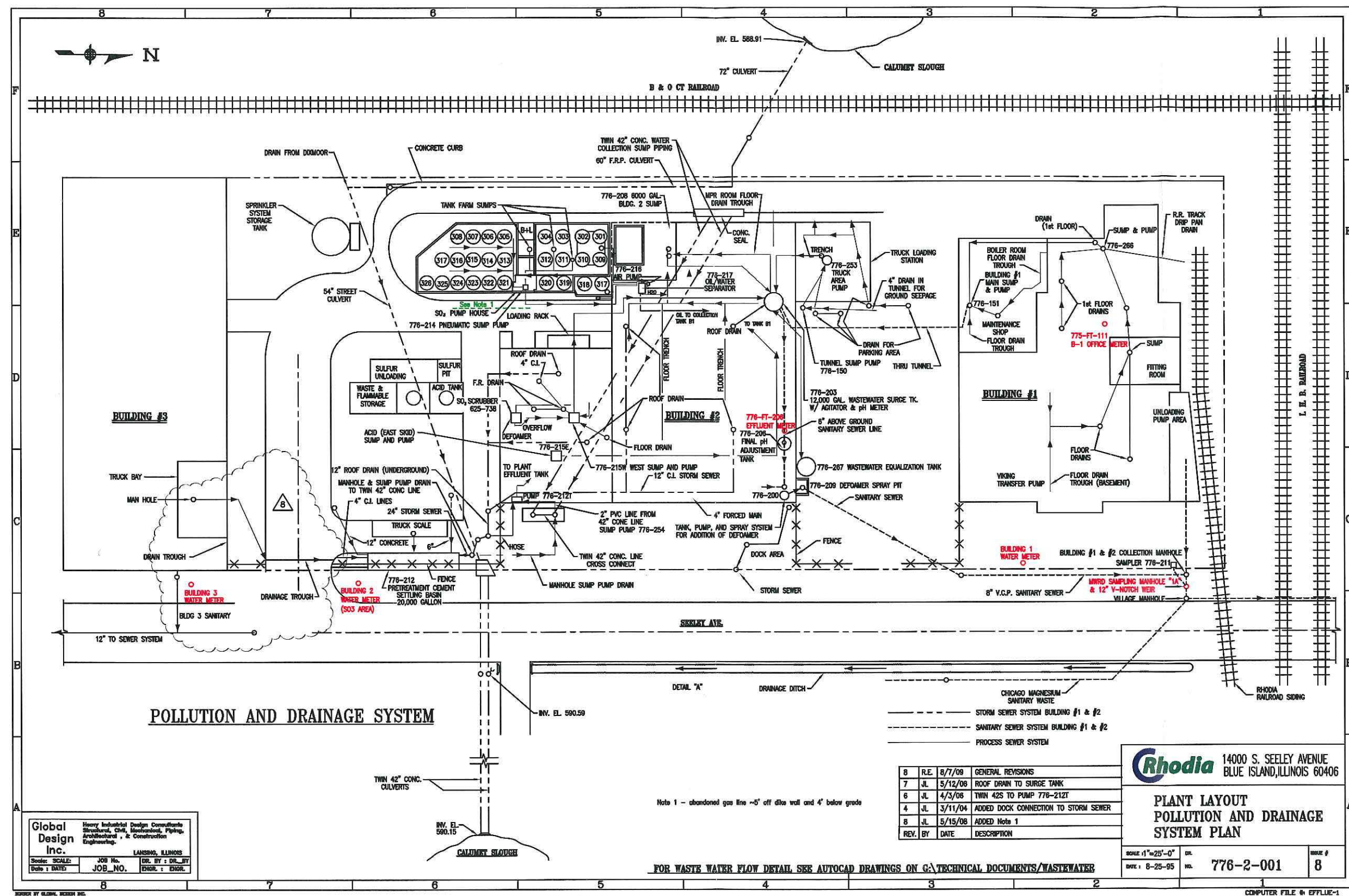
Report run on: December 27, 2011 11:35 AM

Page 5

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description of Universes
Permit Progress	Indicates that the facility is part of the Permitting/Closure/Post-Closure Progress universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Permit Workload	Indicates that the facility is part of the Permit Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Closure Workload	Indicates that the facility is part of the Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Post-Closure Workload	Indicates that the facility is part of the Post-Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Permit GPRA 2006	Indicates that the facility is part of the Permit GPRA 2006 universe. ('+' indicates that the facility is on the GPRA Baseline and meeting the goal; '-' indicates that the facility is on the GPRA Baseline and not meeting the goal; 'N' indicates that the facility is not on the GPRA Baseline)
Renewals GPRA 2006	Indicates that the facility is part of the Renewals GPRA 2006 universe. ('+' indicates that the facility is on the GPRA Baseline and meeting the goal; '-' indicates that the facility is on the GPRA Baseline and not meeting the goal; 'N' indicates that the facility is not on the GPRA Baseline)
Subject to CA	Indicates that the facility is part of the Subject to Corrective Action universe. ('Y' indicates that the facility is in this universe).
Subj CA TSD 3004	Indicates that the facility is a Treatment, Storage or Disposal facility Potentially Subject to Corrective Action Under 3004(u)/(v). ('Y' indicates that the facility is in this universe).
Subj CA TSD Discr	Indicates that the facility is a Treatment, Storage or Disposal facility Subject to Corrective Action Under Discretionary Authorities. ('Y' indicates that the facility is in this universe).
CA Non-TSD	Indicates that the facility is a Non-Treatment, Storage or Disposal facility where Corrective Action has been imposed. ('Y' indicates that the facility is in this universe).
CA GPRA 2008	Indicates that the facility is part of the Corrective Action GPRA 2008 universe. ('Y' indicates that the facility is in this universe).





WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH187619

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #

GENERATOR CODE (Assigned by Clean Harbors)

ADDRESS

CUSTOMER CODE (Assigned by Clean Harbors)

ADDRESS

ILD085343887

RH0069

RH0069

14000 South Seeley Street

14000 South Seeley Street

GENERATOR NAME:

CITY

CUSTOMER NAME:

CITY

Rhodia

Blue Island

Rhodia

Blue Island

STATE/PROVINCE

ZIP/POSTAL CODE

PHONE: (708) 371-2000 x 131

STATE/PROVINCE

ZIP/POSTAL CODE

IL

60406

IL

60406

B. WASTE DESCRIPTION

WASTE DESCRIPTION: ESP Acid Waste

PROCESS GENERATING WASTE: Electrostatic Precipitation

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER ? No

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE

SOLID WITHOUT FREE LIQUID

POWDER

MONOLITHIC SOLID

LIQUID WITH NO SOLIDS

LIQUID/SOLID MIXTURE

% FREE LIQUID

% SETTLED SOLID

% TOTAL SUSPENDED SOLID

☒ SLUDGE

GAS/AEROSOL

NUMBER OF PHASES/LAYERS

123

TOP

MIDDLE

BOTTOM

% BY VOLUME (Approx.)

0.00

0.00

0.00

ODOR

NONE

☒ MILD

STRONG

Describe:

BOILING POINT °F (°C)

<= 95 (<=35)

95 - 100 (35-38)

101 - 129 (38-54)

>= 130 (>54)

VISCOSITY (If liquid present)

1 - 100 (e.g. Water)

101 - 500 (e.g. Motor Oil)

501 - 10,000 (e.g. Molasses)

> 10,000

COLOR

black

MELTING POINT °F (°C)

< 140 (<60)

140-200 (60-93)

☒ > 200 (>93)

TOTAL ORGANIC CARBON

<= 1%

1-9%

☒ >= 10%

FLASH POINT °F (°C)

pH

SPECIFIC GRAVITY

ASH

BTU/LB (MJ/kg)

< 73 (<23)

☒ <= 2

< 0.8 (e.g. Gasoline)

< 0.1

< 2,000 (<4.6)

73 - 100 (23-38)

2.1 - 6.9

0.8-1.0 (e.g. Ethanol)

0.1 - 1.0

2,000-5,000 (4.6-11.6)

101 -140 (38-60)

7 (Neutral)

1.0 (e.g. Water)

☒ Unknown

☒ 5,000-10,000 (11.6-23.2)

141 -200 (60-93)

7.1 - 12.4

☒ 1.0-1.2 (e.g. Antifreeze)

1.1 - 5.0

> 10,000 (>23.2)

> 200 (>93)

>= 12.5

> 1.2 (e.g. Methylene Chloride)

5.1 - 20.0

Actual:

D. COMPOSITION

(List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL

1,4 DIOXANE

CHROMIUM

SULFONIC ACIDS

SULFURIC ACID

MIN

MAX

UOM

3.0000000

5.0000000

%

5.0000000

33.0000000

PPM

70.0000000

90.0000000

%

10.0000000

30.0000000

%

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")?

YES

☒ NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM?

YES

☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL?

YES

☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material.

YES

NO

Chemical disinfection or some other form of sterilization has been applied to the waste.

YES

NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS.

YES

NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED.

YES

NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. G07

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. W219



E. CONSTITUENTS

Are these values based on testing or knowledge? ☒ Knowledge Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

generator knowledge, testing (totals analysis)

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>
D005	BARIUM	100.0				<input checked="" type="checkbox"/>
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>
D007	CHROMIUM	5.0	5.0000	33.0000000	PPM	
D008	LEAD	5.0				<input checked="" type="checkbox"/>
D009	MERCURY	0.2				<input checked="" type="checkbox"/>
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>
D011	SILVER	5.0				<input checked="" type="checkbox"/>

VOLATILE COMPOUNDS			OTHER CONSTITUENTS		MAX	UOM	NOT APPLICABLE
D018	BENZENE	0.5		BROMINE			<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5		CHLORINE			<input checked="" type="checkbox"/>
D021	CHLOROBENZENE	100.0		FLUORINE			<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0		IODINE			<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5		SULFUR			<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7		POTASSIUM			<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0		SODIUM			<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7		AMMONIA			<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5		CYANIDE AMENABLE			<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2		CYANIDE REACTIVE			<input checked="" type="checkbox"/>

SEMI-VOLATILE COMPOUNDS			HOCs		PCBs	
D023	o-CRESOL	200.0	<input checked="" type="checkbox"/> NONE		<input checked="" type="checkbox"/> NONE	
D024	m-CRESOL	200.0	< 1000 PPM		< 50 PPM	
D025	p-CRESOL	200.0	>= 1000 PPM		>=50 PPM	
D026	CRESOL (TOTAL)	200.0			IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?	
D027	1,4-DICHLOROBENZENE	7.5			YES	<input checked="" type="checkbox"/> NO
D030	2,4-DINITROTOLUENE	0.13				
D032	HEXACHLOROBENZENE	0.13				
D033	HEXACHLOROBUTADIENE	0.5				
D034	HEXACHLOROETHANE	3.0				
D036	NITROBENZENE	2.0				
D037	PENTACHLOROPHENOL	100.0				
D038	PYRIDINE	5.0				
D041	2,4,5-TRICHLOROPHENOL	400.0				
D042	2,4,6-TRICHLOROPHENOL	2.0				

PESTICIDES AND HERBICIDES		
D012	ENDRIN	0.02
D013	LINDANE	0.4
D014	METHOXYCHLOR	10.0
D015	TOXAPHENE	0.5
D016	2,4-D	10.0
D017	2,4,5-TP (SILVEX)	1.0
D020	CHLORDANE	0.03
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

CHOOSE ALL THAT APPLY

- DEA REGULATED SUBSTANCE
- POLYMERIZABLE
- EXPLOSIVE
- RADIOACTIVE
- FUMING
- REACTIVE MATERIAL
- OSHA REGULATED CARCINOGENS
- ☒ NONE OF THE ABOVE



F. REGULATORY STATUS

☒ YES

☐ NO

USEPA HAZARDOUS WASTE?

D002 D007

YES

☒ NO

DO ANY STATE WASTE CODES APPLY?

Texas Waste Code

OUTS219H

YES

☒ NO

DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

☒ YES

☐ NO

IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?

LDR CATEGORY:

VARIANCE INFO:

This is subject to LDR.

YES

☒ NO

IS THIS A UNIVERSAL WASTE?

YES

☐ NO

IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES

☐ NO

IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES

☒ NO

DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES

☒ NO

IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES

☒ NO

DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES

☒ NO

DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES

☒ NO

DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES

☒ NO

IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES

☒ NO

IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?

Hazardous Organic NESHAP (HON) rule (subpart G)

Pharmaceuticals production (subpart GGG)

YES

☒ NO

IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?

YES

☐ NO

Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?

YES

☐ NO

Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?

What is the TAB quantity for your facility?

Megagram/year (1 Mg = 2,200 lbs)

The basis for this determination is: Knowledge of the Waste Or Test Data

Knowledge

Testing

Describe the knowledge :

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

RQ, UN2571, WASTE ALKYL SULFURIC ACIDS, 8, PG II (D002, D007)

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY

ONE TIME

WEEKLY

MONTHLY

☒ QUARTERLY

YEARLY

OTHER

Other

☒ CONTAINERIZED

40-60

CONTAINERS/SHIPMENT

STORAGE CAPACITY:

60

CONTAINER TYPE:

CUBIC YARD BOX

PALLET

TOTE TANK

☒ DRUM

OTHER:

DRUM SIZE:

55

BULK LIQUID

GALLONS/SHIPMENT:

0 Min - 0 Max

GAL.

BULK SOLID

SHIPMENT UOM:

TON

YARD

TONS/YARDS/SHIPMENT:

0 Min - 0 Max

I. SPECIAL REQUEST

COMMENTS OR REQUESTS:

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE
jeffrey.chou@us.rhodia.com			

This waste profile has been submitted using Clean Harbors' electronic signature system.

*40 CFR Sec. 264.12 required notice:
As required by Federal Resource Conservation and Recovery Act regulations found in 40 CFR Part 264.12(b) and all equivalent State hazardous waste regulations, notice is hereby provided that all Clean Harbors facilities that may be used to treat, store, and /or dispose of the hazardous waste described on this waste profile have the appropriate permits and the capacity to manage these wastes.
Please note this profile must be submitted for re-evaluation if there has been a change in the waste generating process or when there have been changes in the chemical composition or physical characteristics of the material.

ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.



8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Rhodia Inc.	Client Sample ID:	ESP DECON SLUDGE
Lab Order:	11100598	Report Date:	10/28/2011
Project:	Rhodia Analysis	Collection Date:	10/6/2011 1:15:00 PM
Lab ID:	11100598-01	Matrix:	Solid

Analyses	Result	EMT Reporting Limit	Units	Date Analyzed	Batch	Analyst
ICP Metals, TCLP Extracted		Method: SW6010C / SW3015				
Arsenic	< 0.0625	0.0625	mg/L	10/27/11 10:16	69783	CS2
Barium	0.272	0.0625	mg/L	10/27/11 10:16	69783	CS2
Cadmium	< 0.0625	0.0625	mg/L	10/27/11 10:16	69783	CS2
Chromium	0.344	0.0625	mg/L	10/27/11 10:16	69783	CS2
Lead	< 0.0625	0.0625	mg/L	10/27/11 10:16	69783	CS2
Selenium	< 0.0625	0.0625	mg/L	10/27/11 10:16	69783	CS2
Silver	< 0.0625	0.0625	mg/L	10/27/11 10:16	69783	CS2
Mercury, TCLP Extracted		Method: SW7470A / HG PREP				
Mercury	0.00648	0.0005	mg/L	10/26/11 13:04	69802	IG

Qualifiers:	B - Analyte detected in the associated Method Blank	S - Spike Recovery outside accepted recovery limits
	E - Estimated	R - RPD outside accepted recovery limits
	H - Holding Time Exceeded	J - Analyte detected below quantitation limits



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Report of Laboratory Analysis

CLIENT:	Rhodia Inc.	Client Sample ID:	T-319 ASF/90
Lab Order:	12050717	Report Date:	5/30/2012
Project:	Rhodia Analysis	Collection Date:	5/10/2012 12:00:00 PM
Lab ID:	12050717-07	Matrix:	Liquid

Analyses	Result	EMT Reporting Limit	Units	Date Analyzed	Batch	Analyst
Corrosivity by pH Paper		Method: SW9041A				
pH	9.5		HC pH Units	5/23/12 15:15	R170049	ML3
Open Cup Flash Point		Method: ASTM D92-90				
Ignitibility (open cup)	>180	35.	°F	5/29/12 09:00	R170240	SG

Qualifiers:	B - Analyte detected in the associated Method Blank	S - Spike Recovery outside accepted recovery limits
	E - Estimated	R - RPD outside accepted recovery limits
	H - Holding Time Exceeded	J - Analyte detected below quantitation limits
	C - Laboratory not accredited for this parameter	



Blue Island Training Matrix - 2012

LATE

Shared Services ▼

Chou, Jeff

Click, Jim

Klootwyk, Mike

MONTH	Live Training	Active Learner Courses	Module #	SS	SS	SS
January	Formaldehyde			x	L	
January	Arc Flash			x	L	
January	Hazard Communication		FMT5006	x	L	
January	DOT Hazardous Material Employee Safety		FMT5025	x	x	
February	HSE Objectives & Policy			x	L	
February	Incident Reporting & Trends			x	L	
February	Hydrogen Sulfide: General Industry		FMT50292	x	L	
February	Occupational Exposure to Lead		FMT5053	x	L	
March	HSSE Policy & Cosmetic Ingredient GMP			x	L	
March	LOTO				L	
March	Electrical Safety 1		FMT5020	L	x	
March	Electrical Safety 2		FMT5021	L	x	
April	Emergency Response			x	L	
April	Incident Reporting			x	L	
April	Exposure to Haz Chemicals in Lab		FMT5015	x	x	
April	Exposure to Bloodborne Pathogens		FMT5024	x	x	
April	Portable Fire Extinguisher		FMT5004	x	x	
May	RCRA awareness & SPCC			x	L	
May	Environmental Awareness			x	L	
May	RCRA Generators		FMT50161	x	x	
May	RCRA Treatment/Storage/Disposal Facilities		FMT50163	x	x	
May	RCRA Emergency Response		FMT50164	x	x	
June	Confined Space Entry					
June	HSE Objective review, Incident Reporting					
June	Hearing Protection		FMT5002	x	x	
June	Eye and Face Protection		FMT5013	x		
July	HSSE Rules and Reqs / Contractors					
July	Emerg Action Plans, Alarms, & Fire Prevent		FMT5017			
July	Powered Industrial Trucks		FMT5023			
August	MOC & PPE					
August	TSCA, Medical, Asbestos					
August	Confined Space Entry		FMT5003			
August	Lockout/Tagout		FMT5012			
September	Fit Testing					
September	Chemical Specific Hazards					
September	Hot work		FMT5030			
September	Access to Medical Records		FMT5010			
September	Office Ergonomics		FMT5031a		x	
October	Fire Extinguisher					
October	Respirator Protection		FMT5001			
October	Fall Protection		FMT5022			
November	RCMS					
November	Elevated Work & Scaffolding					
November	Hazwoper: Overview		FMT5007			
November	Hazwoper: Awareness		FMT5008			
November	Hazwoper: Operations		FMT5009			
December	Safe Work (includes Hot work & Line Break)					
December	Accident Prevention Signs and Tags		FMT5018			

An appropriate incident report must be made within 24 hours of any and all incidents and the CAERS procedure shall also be followed for incidents meeting the CAERS criteria.

6.9 Incidents involving hazardous wastes

The Blue Island plant is a large quantity generator of hazardous waste. The primary waste generated at the facility is a mixture of organic sulfonic acids that carries the RCRA waste codes D002 and D007. The waste is managed on-site in 55 gallon drums at a satellite accumulation area at the point of generation at the electrostatic precipitator (ESP). When a drum is full, it is moved to the 90 day storage area (the flammable storage area outside building 2). Additionally the plant generates small quantities of hazardous wastes consisting of flammable waste carrying the RCRA waste code D001 and acid waste carrying the RCRA waste codes D002 and D007 in the laboratory. These wastes are managed on-site in containers at a satellite accumulation area in the lab at the point of generation. Once containers are full containers, they are moved to the 90 day accumulation area.

In the event a spill of hazardous waste is discovered, the employee should immediately contact the shift supervisor. The shift supervisor will notify the emergency coordinator. The spill should be contained using absorbents, spill socks and drain mats which are available in various locations of Building 2 as well as in the 90 day accumulation area. Make sure those not trained to handle the spill do not participate in the response.

If deemed appropriate by the emergency coordinator, an environmental clean-up contractor will be brought in. Rhodia maintains a list of approved contractors.

The emergency coordinator will make a determination of outside reporting needed. Refer to the site SPCC Plan for details on notification requirements for releases of hazardous materials.

Any material used in the clean up of a spill of hazardous materials will be placed in appropriate containers for disposal. This material must be properly labeled and disposed of using an approved waste disposal vendor. Refer to the site SPCC Plan for information on waste disposal requirements.

An appropriate incident report must be made within 24 hours of any and all incidents. Refer to the site SPCC Plan for details on notification requirements for releases of hazardous materials.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

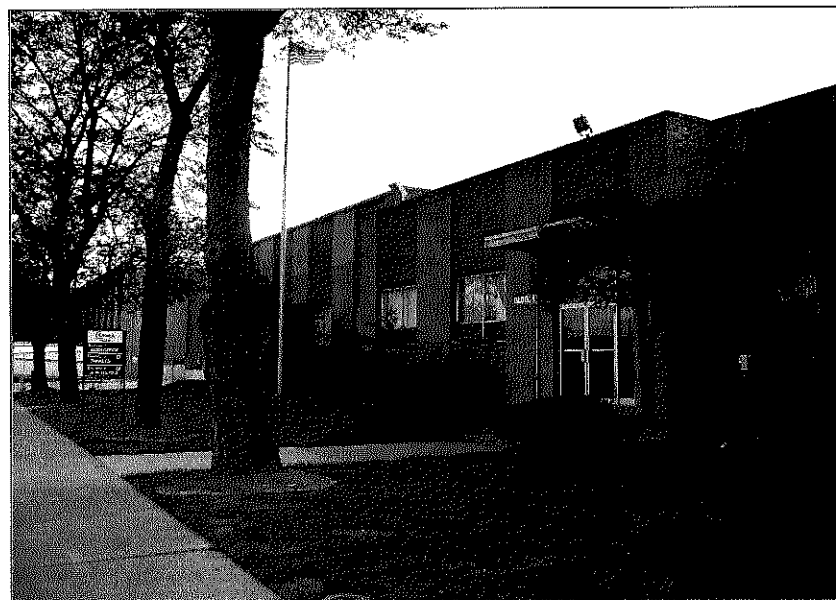
Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 10000000000000000000		2. Page 1 of 2		3. Emergency Response Phone 1-800-424-3762		4. Manifest Tracking Number 003336568		FLE							
		Generator's Name and Mailing Address 34000000000000000000 34000000000000000000 34000000000000000000						Generator's Site Address (if different than mailing address) 34000000000000000000									
GENERATOR		Generator's Phone: 708-571-2000															
		6. Transporter 1 Company Name 34000000000000000000						U.S. EPA ID Number MA0000000000000000									
TRANSPORTER		7. Transporter 2 Company Name 34000000000000000000						U.S. EPA ID Number MA0000000000000000									
		8. Designated Facility Name and Site Address 34000000000000000000 34000000000000000000 34000000000000000000						U.S. EPA ID Number MA0000000000000000									
DESIGNATED FACILITY		Facility's Phone: 708-571-2000															
		9a. HM		9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity		12. Unit WL/Vol.		13. Waste Codes			
GENERATOR				1. NO. 000000. WASTE PLASTIC LIGNITE, H.O.S. (METHANOL), 3, PG II				2		DM		2		6		0000	
				2. NO. 000000. WASTE PLASTIC LIGNITE, H.O.S. (METHANOL), 3, PG II				37		DM		3031		6		0000	
				3. NO. 000000. WASTE PLASTIC LIGNITE, H.O.S. (METHANOL), 3, PG II				2		DF		110		6		0000	
				4. NO. 000000. BATTERIES WET FILLED WITH ACID, 3, PG II				1		CW		1		4			
TRANSPORTER		14. Special Handling Instructions and Additional Information 1. CHL 87621 2. CHL 87621 3. CHL 87621 4. CHL 87621															
		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.															
TRANSPORTER		Generator's/Offor's Printed/Typed Name Rick Edwards						Signature Rick Edwards		Month 07		Day 22		Year 10			
		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.						Port of entry/exit: Date leaving U.S.:									
TRANSPORTER		17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Signature Month 07 Day 22 Year 10															
		Transporter 2 Printed/Typed Name Signature Month 07 Day 22 Year 10															
DESIGNATED FACILITY		18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month 07 Day 22 Year 10															
		18d. Signature of Alternate Facility (or Generator) Month 07 Day 22 Year 10															
DESIGNATED FACILITY		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H000 2. H000 3. H000 4. H000															
		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month 07 Day 22 Year 10															

Blue Island

Site general information

- **Plant Manager:** Phillip McCray
- **Country:** USA
- **Closest city / km:** Chicago, IL / 32 km
- **Global Business Unit:** Novecare
- **Start-up date:** 1906
- **Rhodia site since:** 2000
- **Rhodia participation:** 100%
- **Total area:** 13.5 acres
- **Total headcount:** 46



Processes and Products

- **Main value chains & processes:** Continuous SO₃ Sulfation, Formulated Products
- **Main products:**
 - Performance Concentrate Blends
 - Structured Liquid Blends
 - High and low active
 - Pearlizing Agents
 - Alpha Olefin Sulfonates
- **Key Raw material used:** lauryl alcohol, ethoxylated lauryl alcohol, alpha olefins, amphoteric and betaine surfactants, coconut oil
- **Key energy resources:** electricity, natural gas
- **Major hazards / risks:** fire / explosion, SO₃ release
- **Quality certifications:** ISO9001:2000 (valid thru Dec2012)



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153 ⁸³⁸

312/345-9780

Refer to: General - Cook County - Blue Island/Onyx Chemical
ILD085343887

August 4, 1982

J.O. Martin
Onyx Chemical Company
14000 S. Seeley
Blue Island, Illinois 60406

M.C. Parrott
Onyx Chemical Company
14000 S. Seeley
Blue Island, Illinois 60406

Gentlemen:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on May 19, 1982. This inspection was conducted by the Illinois Environmental Protection Agency under the authority of the Resource Conservation and Recovery Act, Section 3006(c). A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with Title 35, Subtitle G of the Illinois Pollution Control Board Rules and Regulations, as amended. Based on the information obtained during the inspection we have determined that the above facility is exempt from Subtitle G.

Therefore since your facility is not regulated under Subtitle G, we recommend that you submit a letter to this office at the above address, requesting that your EPA Form 8700-12 Notification of Hazardous Activity be withdrawn. Copies of this letter should also be sent to US EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report or letter, please contact Bonnie Eleder at the above number.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BLE:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

STATE IDENTIFICATION NUMBER
(If Applicable)

FLD 08 5343 88-
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Onyx Chemical Company
(B) Street: 14000 S. Seeley Ave.
(C) City: Blue Island (D) State: IL (E) Zip Code: 60406
(F) Phone: 312-321-2000 (G) County: Cook
(H) Operator: Onyx Chemical Company
(I) Street: 14000 S. Seeley Ave.
(J) City: Blue Island (K) State: IL (L) Zip Code: 60406
(M) Phone: 312-321-2000 (N) County: Cook
(O) Owner: Kewanee Industries
(P) Street: 99 Clark Avenue
(Q) City: New York (R) State: NY (S) Zip Code: 10016
(T) Phone: 212-687-2757 (U) County: —
(V) Date of Inspection: 5-19-92 (W) Time of Inspection (From) 9:50am (To) 10:30am
(X) Weather Conditions: 70° Sunny

(Y) Person(s) Interviewed	Title	Telephone
<u>Marvin L. Parrott</u>	<u>Safety Engineer</u>	<u>312-239-1300</u>
_____	_____	_____
_____	_____	_____
(Z) Inspection Participants	Agency/Title	Telephone
<u>M. L. Parrott</u>	<u>Safety Eng.</u>	<u>312-239-1300</u>
<u>B. Eder</u>	<u>IEPA</u>	<u>312-345-9780</u>
_____	_____	_____
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>B. Eder</u>	<u>IEPA/EP3</u>	<u>312-345-9780</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><u> </u> A. Storage and/or Treatment</p> <p> 1. Containers (I)</p> <p> 2. Tanks (J)</p> <p> 3. Surface Impoundments (K)</p> <p> 4. Waste Piles (L)</p> <p><u> </u> B. Land Treatment (M)</p> <p><u> </u> C. Landfills (N)</p> | <p><u> </u> D. Incineration and/or Thermal Treatment (O and P)</p> <p><u> </u> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Division File DATE: May 19, 1987

FROM: B. Elader ☐ Information only

SUBJECT: Cook County - General - Blue Island/Onyx Chemical Company ☐ Response requested

IL2085343587

Onyx Chemical Company is a manufacturer of the chemical ingredients used in the formulation of dishwash detergents, shampoos, hand cleaners, and disinfectants. The only waste they generate is non-hazardous and is regulated under Illinois Special Waste Permit No. 920952 - off-spec mea- and p-formaldehyde. They notified of hazardous waste activity primarily due to a lack of total understanding of the regulations and for if a 'just in case' situation were to occur. At the inspection it was determined that they would de-notify.

*

-- Rhodia Inc
ILD 085 343887
Blue Island, IL



Chemistry is our world, Responsibility is our way

Jeffrey Chou

Regional Environmental Engineer
Novecare

24601 Governors Highway
University Park, IL 60484
Tel.: (708) 235-7291 Mobile: (708) 382-1841
jeffrey.chou@us.rhodia.com

www.rhodia.com

7/18
Arrived

Met w/
Pres
Pres

D
S

7/18/2012
Arrived ~ 7:50 AM

Met w/ Phillip McCray
Presented Credentials

Presented Small Business sheet &
ILL Pharm

Discussed Procedure

Safety: Long sleeve shirt

Safety glasses

hard hat

safety boots

Goggles for lab

Discussed Photos / Camera

Discussed CBI

↳ one potential area on process line



Phillip McCray

Plant Manager
Blue Island Plant
Novacare

14000 South Seeley Avenue
Blue Island, IL 60406
Tel.: (708) 371-2000 Ext. 135 Mobile: (225) 240-3718
phillip.mccray@us.rhodia.com

www.rhodia.com

Facility: Surfacing Acting Agent
Manufacturing

≈ 8 sites in North America

- this site, ^{conducts} continuous sulfonation
with heat, ending up with
various ~~product~~ ^{surfactants} input for
other ~~product~~ companies products

Raw material tanks, product tanks,
intermediate mixing tanks

Running 24/7, ^{four} 12 hour shifts

≈ 45 personnel
on site

Site

1 map

Lab

Used

No

Un
out

1

1

lab

Site in use since 1906

1 major waste stream
sulfonic type Acid
Corrosive

Lab waste

Used oil, universal waste (used bulks)

No H.W. storage tanks

Underground tanks on site, but taken
out of service

1 less-than 90 day storage area

1 satellite area. Potentially one in
lab area \Rightarrow 2 satellite Areas

1 Fire in 2011. Activated
plan.

Walk Through
Escort, Phillip

Bld 1: admin, maint +
utilities

Universal Waste, Used bulbs
not closed, no date

(P1)

Observed bulbs in 2 ^{used}
containers: small lamp + bulbs

Best container, no label

(P2)

P3

Container w/ unresel waste,
bott trash inside p3

Used oil Container (P4)

Fire extinguisher

Between 1 & 2

Cardboard Recycling (P5)

Found one used bulb, broken,
in cardboard recycling container.

Immediately removed by Phillip

recy
w/bo

Bld 2

Process area

Waste water treatment for
pH adjustment

P6 - Raw material tanks

P7 - Sulfur accumulator above molten
sulfur tank.

H₂S smell

Burner section, converted to SO₃
then mix organic materials + SO₂
together

Joined by Mr. Chau
Mr. McCray left

So

Outs
L

①
⑤

②
③

1 - H.

2 - H.

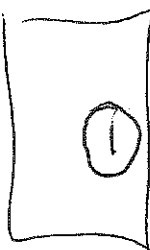
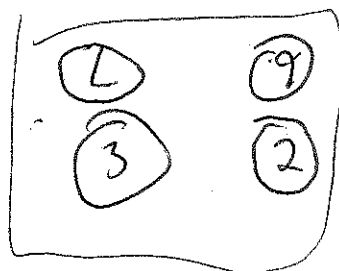
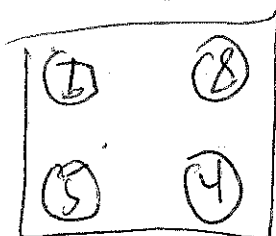
Satellite container

P8 - open, vented

P9 - label

Outside

↳ Hazardous Waste Storage Area
↳ P10



Bottom

P11

1 - H.W. Label 7-16-12 Corrosive/Toxic
0002/0007

2 - H.W. Label 7-13 (12) 11 11
0002/0007

3. H.W. label 7-11-12
Cannine/Toxic 0002/0007

4. H.W. label 7-15-12
Cognosine/Toxic 0002/0007

5. H.W. label 7-15-12
Cannine/Toxic 0002/0007

6. H.W. label 7-14-12
Cannine/Toxic 0002/0007

7. H.W. label 7-11-12
Cannine/Toxic 0002/0007

Non-

1

Non-Haz l

1. C
Pr

2. S

3. S

Non

Non-Haz Containers

1

2

3

Non-Haz labels

1. C12-18 Alkyl Amine
Propyl Dimethylamine
581 lbs

2. Same → 1,835 lbs

3. Same → 1,848 lbs

P12

Barrels



Non-Haz

ESP

Decoria Sludge

Decom Sludge

A3i inside spill hot

Building 3
Warehouse

P17₁₄ inside warehouse

Back outside Bld 2i

G P14¹⁵ WW Equalizer tank
P18¹⁶ PH adjustment tank
P16₁₇ Waste Water to sewer

Lab

th

P17₁₈ empty

Waste flm
Cignel
CM etha
DOO1

2ce

2

Lab, Building 2

H.W. Sate occurs near lab

p17 empty → ○ ← top

18 empty → ○ ← bottom

Waste Hanelle
(liquid
(Methanol)
D001

○ ← Front

Containers closed



D002/D007

~~Acetic~~ White Aryl
Sulfonic Acid,
Liquid

2nd Floor, Bld 2

≈ 60+ tanks

Record Review

Records provided by Mr. Chao
* Request: Site Map Regional Environmental Engineering
Brief slides

Waste Repts →

In 2011: Letter dated 4/28/12

0002/0007 131,922 lbs

ESP Acid Waste

0001

183 lbs

Lab Waste

0001

~~* 1,009~~ 1,009 lbs

MEA / Sodium Methylate Soiled Absorbent

0001

1,376 lbs

MEA / Sodium Methylate Blend

002
ESP W

In 2010

Observation
2

Manifest

005 2314

Gen date: 2/15

TSDF date: 2/15

Gen sig: Jeff

LDR Form

Signatures:

002/0007
ESP Wash Canonic

364 lbs

2010 + 2009 available review

Observation:

2009 10,187 ~~lbs~~ 0002/0007

Manifest

2012

005 231458 FLE

1 DF

55 G

0001 0035

Waste

Aerosols

Gen date: 2/15/12

4 DM

4 G

0001/0022

Waste flammable

Methanol/Glucol

ISO date: 2/25/12

Chloroform

Gen sig: Jeffery Chou

1 DF

55 G

0007/0035

Waste paint

related material

LDR Form

43 DM

2,230 G

0002/0007

Waste

Alkylsulfonic

Acids

Signatures: Jeffery Chou

Mike Berkery

Rich Edwards

005216151 FLE 6 DM 6 gal 0001/0002 Methanol, chloroform
 Gen date 4/26/12 51 DM 2,597 gal 0002/0007 Waste Alkylsulfuric Acids
 TSDF date 5/7/12 4 DM 220 gal 0002/0007 Sodium Hydroxide
 Gen sig: Jeffery Chou 1 OF 5 gal Batteries, Universal waste
 LDR Form 1 OF 1 pound Mercury contained articles
 5 CF 120 pounds Fluorescent Light bulbs

005610357 FLE 4 DM 4 gal 0001/0002 Methanol, chloroform
 Gen date 7/14/12 52 DM 2,656 gal 0002/0007 Waste Alkylsulfuric Acids
 TSDF Date: due 2 Aug 12 2 DM 110 gal 0002/0007 Sodium Hydroxide
 Gen Sig: Jeffery Chou 3 CF 60 pounds Light bulbs - Universal waste
 LDR Form

Nm - Haz Waste Soap/oil/water sludge 1 TT 5600g 1/09/12
 " " " " " " 5,363g 1/18/12
 " " " " " " 4,791g 2/2/12
 " " " " " " 5,200g 2/7/12
 " " " " " " 4,820 2/14/12

anol,
form
aste
sulfuric
acids
odium
hydroxide

iversal waste
anned articles

Light bulb

anol,
form
te
sulfuric Acids
odium
hydroxide
lb
waste

9/10/12
1/18/12
1/2/12
1/5/12
1/14/12

5,500g 2/20/12

4,840g 2/24/12

5,360g 3/15/12

5,050g 3/13/12

5,428g 3/17/12

4,650g 3/30/12

4,569g 3/23/12

5,519g 3/24/12

5,200g 4/26/12

5,047g 4/11/12

6,083 4/14/12

5,061 4/20/12

95 DF 5,225g 3/26/12

4 TP 500g 5/17/12

1 TT 36,140g lbs 5/03/12

1 TT 5,300g 5/10/12

1 TT 5,145g 5/4/12

5,587g 5/15/12

5,800g 5/25/12
5,390g 6/11/12
4,400g 6/4/12

2010

2011 Manifest

004 868197 FLE

004 791975 FLE

004 731903 FLE

004 709444 FLE

006382901 FLE

004463270 FLE

Clean +
Robbie

Clean +

2010 Manifests

003942090 FLE

003942089 FLE

003425882 FLE

003425859 FLE

003396598 FLE

Generator

7/22/10

Clean Harbors Transporter

7/22/10

Robbie D. Woods Transporter

8/4/10

13 days

003396597 FLE

003494891 FLE

003028975 FLE

003136200 FLE

003136199 FLE

~~Clean Harbors~~

003136167 FLE

2009 Manifests

003056706 FLE

Missing Facility to generate Copy

003010932 FLE

003010933 FLE

003010680 FLE

002623747 FLE

002623684 FLE

002623682 FLE

002623665 FLE

002546463 FLE

Waste profiles

On-line

CH187619

CH187619

ESP Acid Waste

0002 0007

pH ≤ 2

Chromium 5 mg/l

Weekly
inspe

ESP Decon Sludge

Emergency Response Plan

Emergency Coordinator : Phil McCray

alt : Jesse Brunsvold

Called the Standard Operating Procedure
Emergency Preparedness Plan
Effective date 1/7/11

Weekly Container inspections

inspectors : Marco V.

Brit Reese

Wes

Craig Zmuda

M. Vargas

Marly Rodriguez

5 mg/l

Out brief: Sam, Phil, Jeff

Satellite Container for review
open, but w/ collector

Manifest

- ↳ one from 2009 missing TSD
- ↳ on transfer over 10 days

Used bulb - in trash

Container w/o label

Container w/ Universal Waste label

Emergency Response plan

- ↳ describe explosion
- ↳ Home address of EC

Departed at 1245

SOF

up

ble

Rhodia, INC
ILD 085 343887
Blue Island, IL